



South London **Waste Plan**



Adopted March 2012



CROYDON
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The South London Waste Plan

The South London Waste Plan is to be used for the determination of planning applications relating to waste facilities (i.e. a facility on a site where waste is sorted, processed, recycled, composted or disposed of or a facility on a site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling, composting or disposal). Planning decisions for waste facilities must be made in accordance with this plan and other documents and plans which constitute a borough's Development Plan, unless material considerations indicate otherwise.

The South London Waste Plan is a Development Plan Document and forms part of the Local Development Frameworks for the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton. The Local Development Framework of each borough contains or will contain other Development Plan Documents, such as Core Strategies, Development Management Policies and Area Action Plans.

Most adopted Development Plan Documents within a Local Development Framework are likely to have policies which are relevant to a waste application. In addition, some boroughs may have saved Unitary Development Plan policies that may be of relevance.

Each borough may also have adopted Supplementary Planning Documents which may be relevant. Development Plan Documents which are in preparation also gain weight in planning decisions as they approach adoption.

Finally applications will also be decided according to the policies of the Mayor of London's London Plan, which is also part of the Development Plan.

Applicants who are proposing waste facilities are advised to consult the documents and plans of the appropriate borough in addition to the South London Waste Plan.

For further information, in the first instance, visit the planning policy pages of the relevant borough's website:

www.croydon.gov.uk

www.kingston.gov.uk

www.merton.gov.uk

www.sutton.gov.uk

The London Plan can be accessed at:

www.london.gov.uk

Applicants should then consult the relevant borough's Development Management Team.

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Figure I.1: Map showing the South London Waste Plan Area



Introduction

- 1.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have collaborated to prepare this Joint Waste Development Plan Document, known as the South London Waste Plan.
- 1.2 This document is presented in the following sections:
- [Section 1](#) Introduction
 - [Section 2](#) The Need to Plan for Waste
 - [Section 3](#) Plan Area Context and Key Issues
 - [Section 4](#) Vision, Objectives and Policies
 - [Section 5](#) Site Descriptions
 - [Schedule 1](#) Existing Permitted Waste Sites
 - [Schedule 2](#) Industrial Areas with Sites Suitable for Waste Facilities
 - [Schedule 3](#) Information which may be Required for a Planning Application
 - [Appendix 1](#) List of Evidence Base Studies
 - [Appendix 2](#) Guidance Used in the Production of the South London Waste Plan
 - [Appendix 3](#) Glossary
 - [Appendix 4](#) South London Waste Plan Compliance with the EU Waste Framework Directive
- 1.3 The South London Waste Plan sets out the partner boroughs' long-term vision, spatial strategy and policies for the sustainable management of waste over the next 10 years. The Waste Plan contains policies (see Section 4) to promote the adequate provision of modern, high quality, clean and well-run waste management facilities (including for disposal) on the most suitable sites and areas in the partner boroughs.
- 1.4 It ensures that more waste is re-used, recycled or turned into useful compost or energy and less waste is sent to landfill. It ensures that positive benefits are realised, in particular the production of heat and power for local use. Importantly, the policies within the plan ensure that development does not negatively impact on communities' quality of life.

Background

- 1.5 National guidance¹ advocates, where appropriate, collaborative working to tackle the issue of sustainable waste management and, in autumn 2007, the partner boroughs' decision-making bodies endorsed the proposal to prepare a joint Waste Development Plan Document, known as the South London Waste Plan. The boroughs already had a track record of successful partnership working, having previously secured joint funding for a number of recycling and composting projects. More recently, the four boroughs have formed the South London Waste Partnership to procure waste treatment and disposal contracts for municipal waste jointly².

The Local Development Framework

- 1.6 The South London Waste Plan forms part of each borough's Local Development Framework (LDF) as set out in each borough's Local Development Scheme. It is also part of the legal development plan for all four boroughs.
- 1.7 A borough's LDF comprises a number of documents which together outline how development and change will be managed in an area.
- 1.8 The Core Strategy is considered to be the key document within a borough's LDF and each borough is producing its own individual Core Strategy. The Core Strategies reflect the spatial objectives of each borough's Sustainable Community Strategy³ and must be in general conformity with the Mayor's London Plan.

1 Planning Policy Statement 10: "Planning for Sustainable Waste Management" Companion Guide (ODPM, 2006) para 2.10

2 Municipal waste is that which arises from households but also includes waste collected by local authorities as a result of other activities including street sweeping and municipal park maintenance.

3 A Sustainable Community Strategy is produced with key local partners and sets out the strategic vision for an area.

Figure 1.2: Relationship between Regional and Local Plans



1.9 A range of other plans sit under the boroughs' Core Strategies. These include other Development Plan Documents (DPDs), such as site allocation documents, area action plans and development management policies documents. In addition, councils also produce Supplementary Planning Documents (SPDs) which provide guidance and advice at the local level. All documents within a borough's LDF must be consistent with that borough's Core Strategy and help deliver the relevant elements of the borough's Sustainable Community Strategy.

1.10 Figure 1.2 identifies the relationship between the South London Waste Plan and the Core Strategies for Croydon, Kingston and Merton and Sutton. Care has been taken to ensure the Waste Plan is in conformity with the Core Strategies. This has been achieved by agreeing common objectives for each borough's Core Strategy Waste Policies. In turn, these policies are supported by the Vision and Objectives of the South London Waste Plan. The Vision and Objectives of the South London Waste Plan also reflect the relevant aims of each borough's Sustainable Community Strategies.

Section 2: The Need to Plan for Waste

2.1 In response to European Directives on waste management, a wealth of national guidance and policies exists to support the sustainable management of waste. Full details are provided in Appendix 2 of this plan. This section summarises key drivers for the South London Waste Plan.

National Drivers

2.2 Planning Policy Statement 10 "Planning for Sustainable Waste Management" (para 3) requires planning authorities to plan for the sustainable management of waste. This national policy guidance recognises the UK's reliance on landfill and its limited capacity to recycle, compost and treat waste in other ways. National and regional guidance acknowledges¹ that burying waste in the ground in landfill sites is no longer sustainable. This practice not only wastes resources which could be recycled; the breakdown of waste in landfill also releases the powerful greenhouse gas methane, which, if not properly managed, contributes to climate change. National policy² therefore encourages less waste to be treated in landfill, more to be recycled and composted, and energy and heat to be extracted from waste for the local community benefit. The 'waste hierarchy' identifies the preferred environmental options.

2.3 This change is being driven by recycling targets (see Table 2.1) together with a suite of market mechanisms to make landfill more costly than treating waste higher up the waste hierarchy. These include annually escalating costs for the disposal of waste to landfill and the risk of fines for local authorities (and an increasing burden on local taxpayers) if challenging landfill reduction targets are not met. Consequently, landfill is no longer a financially viable option for local authorities.

Regional Drivers

2.4 Regionally, the Mayor of London has also set challenging recycling targets. Approximately 6.6 million tonnes of the 22 million tonnes of waste London produces ends up in landfill³. Much of this is unsegregated waste and means that resources are being lost as materials that could be re-used or recycled are not being recovered.

1 PPS10 (ODPM, 2005) para 3, London Plan (GLA, 2011) para 5.69

2 PPS10 (ODPM, 2005) para 3

3 State of the Environment in London (EA, Aug 2010) page 47-48

Figure 2.1 Waste Hierarchy



Prevention - the most effective environmental solution is often to reduce the generation of waste, including the re-use of products

Preparing for Re-use - products that have become waste can be checked, cleaned or repaired so that they can be re-used

Recycling - waste materials can be reprocessed into products, materials, or substances

Other Recovery - waste can serve a useful purpose by replacing other materials that would otherwise have been used

Disposal - the least desirable solution where none of the above options is appropriate

Table 2.1 Recycling Targets by Waste Stream

Waste stream	Recycling / Composting target	Source
Municipal waste	45% by 2015	London Plan (2011) Policy 5.16
	50% by 2020	London Plan (2011) Policy 5.16
	50% by 2020	The partner boroughs' Joint Municipal Waste Management Strategy (JMWMS)
Commercial and Industrial waste	Exceeding 70% by 2020	London Plan (2011) Policy 5.16
Construction, Demolition and Excavation waste	Exceeding 95% recycled or re-used by 2020	London Plan (2011) Policy 5.16

2.5 Environment Agency data on the movements of waste to landfill reveals that, in 2008, 76% of London's municipal waste which is landfilled goes to landfill sites in the East and South-East England regions. Of London's commercial and industrial waste which is landfilled, approximately 60% is exported to the East and South East regions⁴.

2.6 In acknowledgement of the environmental impacts of transporting waste, the Mayor of London encourages the disposal of waste in the nearest appropriate installation and has ambitions to manage more waste within the capital⁵.

2.7 Currently, London manages around 53% of its waste within its borders⁶. To improve this, the Mayor's London Plan sets targets to increase the amount of London's waste to be managed within the capital, reaching 100% by 2031⁷.

2.8 To achieve the Mayor's ambitions for greater self-sufficiency in waste management, all London boroughs are required to manage a proportion of London's waste within their own boundaries. This is known as the waste apportionment.

Local Drivers

2.9 Locally, all boroughs' community plans have targets and objectives to minimise waste reduce the amount disposed of in landfill, increase recycling and reduce carbon outputs. These ambitions are cemented in the partner boroughs' Joint Municipal Waste Management Strategy (JMWMS). The JMWMS includes the boroughs' aim to achieve 50% recycling and composting by 2020.

2.10 Within the South London Waste Plan area, roughly 1.1 million tonnes of waste is produced each year and traditionally, much of this has been disposed of in landfill. In the plan area, 378,000 tonnes of waste per year is generated by local businesses and industry⁸, 404,000 tonnes is collected as municipal waste by local authorities⁹ while 267,000 tonnes of construction, demolition and excavation waste has been

4 State of the Environment in London (EA, Aug 2010) page 47-48

5 London Plan (GLA, 2011) para 5.69

6 London Plan (GLA, 2011) para 5.67

7 London Plan (GLA, 2011), para 5.77

8 DEFRA (2010) Survey of Commercial and Industrial Waste Arisings in 2009

9 DEFRA (2010) Local Authority Collected Waste for England

estimated to be produced. In 2009-10, 61% of this municipal waste was buried in landfill and 36% was recycled or composted¹⁰. Around 17% of the waste generated from local businesses and industry is also landfilled, however, the DEFRA statistics also list 18% of the treatment as "unknown"¹¹.

2.11 In South London, it is recognised that the existing capacity to compost, recycle and treat waste in facilities outside landfill is low, when compared with the Mayor of London's waste apportionment for the plan area. This critical factor indicated a need to review the partner boroughs' existing policies related to waste development. This provided an opportunity for the boroughs to work together to develop a clear vision to facilitate the supply of more sustainable waste management for the sub-region.

2.12 Taking guidance from Planning Policy Statements 10 "Planning for Sustainable Waste Management" and 12 "Local Spatial Planning" together, the Government provides eight guiding principles, which underpin the development of all LDF documents, including the South London Waste Plan. These are:

(i) Understanding of the Needs of the Local Community and the Plan Area's Context.

The Waste Plan is based on a clear understanding of the waste management needs of its local communities and the opportunities and constraints affecting the partner boroughs. Its preparation was informed by evidence gathering on a range of key planning issues (see Appendix 1).

(ii) Consistency with International, National and Regional Policy.

The Waste Plan takes account of Government guidance, as set out in Planning Policy Guidance (PPG) and in Planning Policy Statements (PPS) and listed in Appendix 2. The South London Waste Plan conforms generally to policies in the London Plan (2011).

(iii) Integration with Other Strategies. The Waste Plan sets out the partner boroughs' vision for sustainable waste management; one in which waste is considered a resource and where benefits to local communities are

realised. The strategy identifies local priorities within the partner boroughs' Core Strategies as well as the South London Waste Partnership's JMWMS.

(iv) Sustainability. Sustainable development lies at the heart of the planning system. The purpose of a sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised DPDs or SPDs¹².

Accordingly, the partner boroughs undertook an SA at each stage of the plan's preparation: 'Issues and Options' (2008), 'Potential Sites and Policies' (2009), 'Additional Sites' (2010) and Proposed Submission (2011).

The SA Report on the South London Waste Plan is available on each borough's website. The boroughs' approach to the SA incorporates the requirements of the Strategic Environmental Assessment Directive¹³, which requires a strategic environmental appraisal to be undertaken on all plans and programmes with significant impacts. An Equalities Impact Assessment was also undertaken as part of the SA process to ensure the South London Waste Plan does not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties under the Disability Discrimination Act (1995), Race Relations Amendment Act (2000) and other regulations.

(v) Continuous Involvement of Stakeholders.

The partner boroughs informed, involved and consulted the local community and all interested parties, including the waste management industry, throughout the preparation of the Waste Plan in line with

10 DEFRA (2010) Local Authority Collected Waste for England

11 DEFRA (2010) Survey of Commercial and Industrial Waste Arisings in 2009

12 Development Plan Documents and Supplementary Planning Documents

13 The EU Strategic Environmental Assessment Directive (2001/42/EC) is implemented in the UK by the SEA Regulations 2004

the measures set out in the boroughs' adopted Statements of Community Involvement (SCI). The Statements of Consultation (also available on borough websites) set out the consultation measures undertaken and summarises the main issues raised in consultations during the plan's preparation. They also identify how responses were taken into account during the plan's development.

(vi) Spatial Planning. The Waste Plan must be a 'spatial plan'. Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and other use of land with other policies and programmes which influence the nature of places and how they function.

(vii) Deliverability. The Waste Plan must be deliverable; the sites and policies must support the growth needed. National guidance requires the partner boroughs to demonstrate that "the stock of allocated land does provide sufficient opportunities..." and that to achieve this, "consideration should be given to any identified constraints to site deliverability."¹⁴ In developing the plan therefore, the partner boroughs had regard to the investment and operational plans of the waste management industry and landowners. As spatial planning is not limited to the activities that are controlled by the Council, working with partners and other agencies is vital to the successful implementation of this plan.

(viii) Flexibility. To ensure sufficient additional waste management capacity is delivered, the plan must provide some flexibility to adapt to changing circumstances. The timeframe for the Waste Plan is 10 years, as set out in national guidance¹⁵. However, where issues which fall beyond this time period are known, these are identified within the plan. The plan will also be monitored annually through each borough's monitoring and reporting processes which will pick up issues.

Preparation of the South London Waste Plan

2.13 All boroughs have an adopted Statement of Community Involvement which form part of their LDFs and the South London Waste Plan was prepared in accordance with these. Where requirements in boroughs' SCIs vary, the most stringent requirements were adhered to. This enabled a common approach to consultation to be implemented across the entire plan area.

2.14 Four document preparation stages took place:

Stage 1: 'Issues and Options:' September to October 2008

2.15 In this initial stage of consultation, comments were sought on the suggested criteria that the four boroughs would use to compile a 'long list' of potentially suitable sites for waste management facilities. At that time, no specific sites were identified, but the area of search for sites was defined as existing waste sites and industrial areas identified in each of the four boroughs' Unitary Development Plans, in accordance with guidance in the 2008 London Plan¹⁶. During that consultation period, residents also suggested 13 other sites to be considered. A 'long list' of around 140 sites was compiled from this information.

2.16 Following this consultation, the potential suitability of the sites on the 'long list' for waste management purposes was assessed by environmental consultants Mouchel. The assessment looked at issues such as site configuration, proximity to residential areas, traffic impacts and visual intrusion and gave a score to each site. The sites that scored well were those which had the fewest constraints and were therefore potentially the most suitable sites for hosting waste management facilities.

14 PPS10 "Planning for Sustainable Waste Management" (ODPM, 2006 para 7.26

15 PPS10 (ODPM, 2006) para 16

16 London Plan (GLA, 2008) Policy 4A.22 and Policy 4A.23

- 2.17 Having a high score, however, was acknowledged as not in itself sufficient to determine achievability or availability. In accordance with the need to provide deliverability of sites, where known or suspected, constraints on site deliverability were considered. An example of a deliverability constraint was where recent planning permission has been granted for another development which resulted in the site being unlikely to be available during the lifetime of the South London Waste Plan. Another example is where a site is allocated in policy for housing development which is another key priority for the partner boroughs.
- 2.18 The score from the site assessment process along with a consideration of the deliverability factors enabled the partner boroughs to identify a 'shortlist' of 28 sites. The remaining sites from the 'long list' were considered to have too many obstacles to their development for waste management purposes. These were published online and in an accompanying technical report. Comments on all sites were encouraged during the second stage of consultation.

Stage 2: 'Potential Sites and Policies:' July - October 2009

- 2.19 This second consultation gave residents and other interested parties the opportunity to review and comment on the 28 'short-listed' sites, as well as the remaining sites from the original 'long list' which did not make it on to the shortlist. Respondents were also given the opportunity to suggest sites that had not been previously considered (i.e. were not included in the original 'long list' of 140 sites).
- 2.20 The Stage 2 consultation attracted more than 1,200 responses from local residents, waste industry operators, landowners, national bodies and Government departments. In addition, 200 people attended public workshops and planning officers were also invited to attend 35 face-to-face discussions with local resident groups and organisations to discuss the development of the plan.

Stage 2a: 'Additional Sites:' February to March 2010

- 2.21 Eight new sites were put forward by consultees for consideration during the Stage 2 consultation. All eight sites were assessed using the same set of criteria employed at the previous consultation stage. All eight sites scored relatively poorly and would not have made it on to the shortlist of 28 sites in the previous stage of consultation. This indicates that a number of obstacles had been identified which would constrain their development for waste management purposes.

Final Stage: 'Proposed Submission:' January to February 2011

- 2.22 The primary purpose of this stage was to assess whether the South London Waste Plan was legally compliant and 'sound' and as such, representations were encouraged, where possible, to address legal compliance and soundness issues.
- 2.23 To be considered 'sound' the Waste Plan had to be "**justified, effective and consistent with national policy.**"¹⁷

- **Justified** means the plan must be founded on a robust and credible evidence base and is the most appropriate strategy when considered against the reasonable alternatives
- **Effective** means that the plan must be deliverable, flexible and able to be monitored.

Examination-in-Public April to October 2011

- 2.24 Following the proposed submission stage, the plan was submitted to the Secretary of State for Communities and Local Government in April 2011 and its Examination-in-Public before a Planning Inspector then commenced. Public hearings were held in July. The Examination-in-Public closed when the Planning Inspector published his report on 26 October 2011.

17 PPS12 (ODPM, 2006) para 4.52

Adoption

January-March 2011

- 2.25 After considering the Inspector's Report, the boroughs decided to incorporate all the changes endorsed by the inspector to make the South London Waste Plan sound.
- 2.26 The South London Waste Plan was adopted on the following dates:
- Croydon - 30 January 2012
 - Kingston - 24 January 2012
 - Merton - 1 February 2012
 - Sutton - 5 March 2012

The Evidence Base

- 2.27 A wide range of evidence base studies were carried out to inform the plan's development. These ranged from identifying potential concerns arising from traffic on the local road network to identifying the key environmental health concerns associated with waste development and their potential impacts as well as identifying planning constraints for potential sites. A study was also carried out to determine the deliverability of potential sites over the plan period. These studies ensured the policies of the South London Waste Plan address all those issues important to residents and other interested parties within the plan area. It also ensured the most suitable sites have been safeguarded for waste use.
- 2.28 The full range of reports and studies which form the South London Waste Plan's evidence base is identified in Appendix 1.

and Richmond forms the South London Sub-Region which is identified in the 2011 London Plan. Progress on waste planning in the surrounding areas (as of September 2010) is summarised below:

- Richmond is part of the joint West London Waste Plan, which lies to the west of the plan area. At the time of writing, West London was due to consult on its Preferred Strategy in 2010. The West London Plan area has one of the largest concentrations of industrial land in London (c.1,500ha)¹ and hosts Park Royal, the largest industrial and business park in London occupying 650 hectares. In terms of the supply of land suitable for waste facilities, the Mayor of London's waste apportionment identifies that, when compared to other London boroughs, Hillingdon, Ealing and Hounslow particularly have capacity to manage waste within their boundaries². In light of this evidence, it is considered that the West London Waste Plan will be capable of meeting West London's own waste management needs.
- Wandsworth's adopted Core Strategy identifies the borough must allocate 1.75ha of additional land to meet its waste apportionment. The Core Strategy identifies there is sufficient land available within the borough's 53 hectares of Strategic Industrial Land and specific sites will be identified in the borough's Site Specific Allocations Document.
- Lambeth's adopted Core Strategy identifies a need for an additional 3.4 hectares of land to meet its waste apportionment. The Core Strategy states that sufficient sites to meet this need will be identified in Lambeth's Sites Allocations Development Plan Document.
- To the East lies the South-East London Joint Waste Group covering Bexley, Bromley, Greenwich, Lewisham and Southwark. Their joint Technical Report (March 2010) shows the South East London region has surplus capacity and will provide greater capacity than required by the waste apportionment. This will be provided at 18 strategic safeguarded waste sites across the boroughs.

- To the South, the Surrey Waste Plan was adopted in 2008, with amendments made by order of the High Court in 2009. Policy CW4 (Waste Management Capacity) identifies that planning permissions will be granted to enable sufficient waste management capacity to be provided to meet both the equivalent tonnage of waste arising in Surrey, as well as a contribution to meeting the declining landfill needs of residual wastes arisings exported from London.

- 3.6 In summary, as of September 2010, all neighbouring London boroughs had identified or were in the process of identifying sufficient land to meet their own waste management apportionments, as set out in the 2008 London Plan. While Surrey has allocated sufficient land to meet its equivalent tonnage of arisings within the 2008 Surrey Waste Plan.
- 3.7 Regarding cross-boundary waste movements, unlike the regional context, the majority of municipal waste produced in the South London Waste Plan area has historically been managed within the partner boroughs' boundaries. This is due to the presence of significant landfill and composting facilities at Beddington Farmlands, Sutton.
- 3.8 In 2008, 90% of the plan area's residual municipal waste³, was landfilled at Beddington Farmlands. This trend continues, and since 2008, approximately 200,000 tonnes of municipal waste has annually been landfilled at Beddington.
- 3.9 With regard to the boroughs' recyclable waste, 40% of this (i.e. all kitchen and garden waste) is treated in Viridor's In-Vessel Composting facility at Beddington Farmlands, Sutton.

1 GLA (2008) Industrial Land Capacity Supplementary Planning Guidance

2 GLA (2009) Minor Alteration to the Draft Replacement London Plan: Borough Level Waste Arisings and Apportionments and Corrections and Clarifications

3 Residual waste is that which is left over, once all the recyclables have been taken out. Waste Data Interrogator for 2008 (EA, 2010)

- 3.10 The remainder of the boroughs' recyclable waste (i.e. the dry recyclables such as tins, plastic bottles, card and paper) is treated at a Materials Recycling Facility (MRF) in Kent. In addition, since 2008, 10,000 tonnes per year of residual waste has been sent to an energy recovery facility near Slough, Berkshire.
- 3.11 Finally, the partner boroughs operate six Household Waste and Recycling Centres (HWRCs) which, since September 2008 have been managed by Environmental Waste Controls. The HWRC sites allow residents to recycle a wide variety of waste streams including many bulkier items and excess garden waste that cannot be economically collected at the kerbside.
- 3.12 Recyclables collected at the HWRCs are reprocessed into new products. The location of these various reprocessing facilities will vary throughout the year, depending on market forces. Some materials may be reprocessed in London, whilst others will be reprocessed outside of the capital. Since these arrangements change month-by-month, it is difficult to quantify how much of this waste is reprocessed outside of the region.
- 3.13 The arrangements to treat the boroughs' kitchen and garden waste, recyclables and operation of the HWRCs are contractual arrangements which are fixed until at least 2022. All contracts have the option to be extended by five years, until 2027.
- 3.14 Regarding commercial and industrial (C&I) waste, there is no borough level data available on the movements of this waste stream. However, London-wide data reveals that whilst the majority of landfilled C&I waste is disposed of in facilities outside London, 89,661 tonnes is disposed of at the landfill facility in Beddington, Sutton each year.
- 3.15 The Waste Data Interrogator for 2009 (EA, 2010) further reveals that the landfill facility in Beddington, Sutton accommodated 330,059 tonnes of waste in 2009. Given that 200,000 tonnes of the boroughs' municipal waste is currently deposited here, plus an additional 100,000 tonnes of London's commercial and industrial waste, it is assumed that the balance includes some imports from outside the plan area.
- 3.16 In summary, the evidence shows that surrounding areas are generally able to accommodate their own waste needs or have very little impact on the South London Waste Plan area. Only Surrey is known to export sizeable amounts of household and commercial and industrial waste outside its area. This includes limited quantities of waste material that are sent to waste facilities in the South London Waste Plan area for treatment. Furthermore, evidence shows the exports from the South London Waste Plan area are limited to reasonably small quantities of municipal waste that are sent to Surrey, to a Materials Recycling Facility in Kent and an energy recovery facility in Berkshire. The contractual arrangements with the Kent and Berkshire facilities are ongoing throughout the plan period. The other key exports from the plan area are commercial and industrial waste, though quantities and destinations, apart from Surrey, are largely unknown and there are some imports from outside the plan area to the landfill facility at Beddington, Sutton. Finally, as identified previously, the Surrey's Waste Plan does accommodate decreasing waste exports from London to landfill throughout the plan period.
- 3.17 The key issues for the South London Waste Plan to consider in relation to cross-boundary issues were:**
- To accommodate the partner boroughs' waste apportionment within the plan area so as to contribute towards progress to London-wide self-sufficiency.
 - To accommodate the partner boroughs' waste apportionment within the plan area which in turn will provide increased recycling, composting and disposal capacity for commercial and industrial waste within the plan area.
- 3.18 These issues are addressed within the Plan's Vision, Objectives and Policies WPI, WP2, WP3 and WP4 (see Section 4).

Key Issue 2: How much waste must the South London Waste Plan accommodate?

3.19 The 2011 London Plan estimated that, in total in 2011, around 995,000 tonnes of waste would be produced within the plan area:-

- 556,187 tonnes generated by local businesses and industry each year;
- 438,416 tonnes as municipal waste collected by local authorities;
- In addition, around 16,000 tonnes of hazardous waste.
- There are unknown quantities of Construction, Demolition and Excavation Wastes which are likely to be significant, but, as in London as a whole, the majority is expected to be recycled onsite.
- There is also sewage waste which is treated in sewage treatment plants at Thames Water's facilities in Beddington Farmlands, Sutton and the Hogsmill Valley, Kingston. It should be noted that policies within Sutton and Kingston's Core Strategies recognise and support any necessary expansions to this important infrastructure in order to accommodate growth.

3.20 The total amount of waste produced annually throughout the plan period is expected to rise by around 22,000 tonnes to almost 1.02 million tonnes over the Waste Plan period. The Mayor of London's waste apportionment in the 2011 London Plan for the plan area is slightly lower than the anticipated arisings, reaching the equivalent of 92% of waste arisings in 2021⁴.

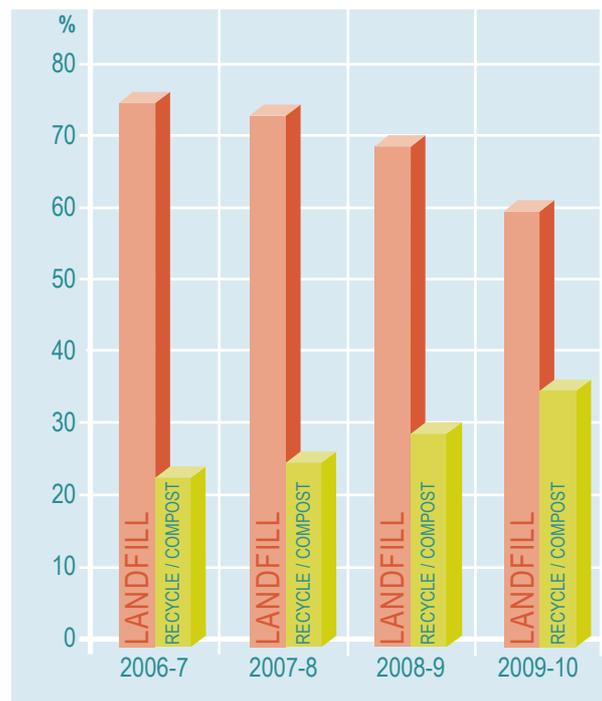
3.21 Figure 3.2 shows the anticipated waste growth for the South London Waste Plan area is shallow. Although population growth and employment growth are expected in the sub-region, the partner boroughs are committed to waste minimisation and to curbing the amount of waste each person and employee produces.

Figure 3.2: Waste Arisings and Apportionments for the plan area



3.22 The success of the partner boroughs' commitment to waste minimisation is evident in recent years' municipal waste figures, which show a decrease in the overall quantities produced (see Figure 3.3).

Figure 3.3: Fate of MSW in South London 2006-09



4 London Plan (GLA, 2011) Tables 5.2 and 5.3

3.23 Waste minimisation will remain a key priority throughout the plan period for all partner boroughs. It features strongly in the boroughs' Joint Municipal Waste Management Strategy (JMWMS) which describes how they will manage waste more sustainably. This strategy was published in 2011 and contains the following targets to minimise waste:

- **JMWMS Target 3:** "Zero growth in the amount of waste produced by each household per year."
- **JMWMS Target 4:** "Zero overall waste growth from 2019/20 (i.e. even when new houses are built there is not an increase in total waste produced)."
- **JMWMS Target 5:** "To reduce the amount of waste not re-used, recycled or composted by residents of the South London Authorities to 225 kg per capita by 2020."

3.24 These are challenging waste prevention targets and the JMWMS recognises the need to build on existing work and develop coordinated waste awareness and education actions amongst the authorities.

3.25 The JMWMS also commits the boroughs to undertaking additional campaigns and programmes which will be aimed at helping reduce arisings and increase public awareness about waste issues.

3.26 With regard to reducing the amount of waste produced per employee in local businesses and industry, the Environment Agency observes that the majority of businesses in London employ fewer than five people. They surmise that the smaller the business the less time and resource is available to address environmental issues and that many smaller businesses who want to improve their environmental performance do not know where to begin⁵.

3.27 To address this, the boroughs' JMWMS acknowledges that increasing commercial and industrial recycling rates will require increased education and promotion amongst local businesses. The South

London Waste Partnership is committed to sharing knowledge and developing actions to be undertaken across all partner boroughs. Key objectives within the JMWMS to improve recycling rates for commercial and industrial waste are:

- **JMWMS Objective 1:** "The Partnership will take a coordinated approach to waste awareness and education by encouraging the sharing of best practice between the authorities by engaging with residents and local businesses."
- **JMWMS Objective 14:** "The Partnership will encourage the authorities to promote commercial waste recycling."

3.28 The key issues for the South London Waste Plan to consider in relation to how much waste the plan must manage were:

- **To accommodate the partner boroughs' waste apportionment within the plan area.**
- **To provide additional capacity above the apportionment, to enable the boroughs to manage the equivalent tonnage of all waste occurring within the plan area.**

3.29 This issue is addressed within the Plan's Vision, Objectives and Policies WP3 and WP4 (see Section 4).

Key Issue 3: What number and range of waste facilities are needed?

3.30 The locations and types of existing waste facilities that are safeguarded for the plan period are shown in Schedule 1 and Figure 4.1 (Pages 38 and 39).

3.31 As of July 2011, this shows there are three facilities dealing principally with metal recycling, four household waste and recycling centres (which, in effect, act as open-air materials recycling facilities), a further three household waste and recycling centres which share a site with the boroughs' waste transfer facilities, two composting facilities and three materials recycling facilities (MRFs), ten waste transfer facilities and a landfill site⁶.

⁵ State of the Environment in London (EA, Aug 2010) page 55

⁶ EA data received November 2010

- 3.32 The waste transfer facilities do not manage waste under the London Plan definition of waste management (which is the use of thermal treatments or composting or recycling). They simply act as depots for the storage of waste which is then sent on to be treated elsewhere.
- 3.33 For clarity, the South London Waste Plan is applicable to all waste facilities. Unlike waste transfer facilities, waste management facilities can provide capacity to help meet the London Plan apportionment and arisings (for example, through energy recovery, recycling and composting).
- 3.34 In total, the plan area's existing waste management facilities are capable of treating just over 376,000 tonnes of waste per year⁷. Figure 3.2 shown previously identifies the plan area already produces in the region of 995,000 tonnes of waste each year. There is therefore already insufficient capacity to manage the equivalent tonnage that is produced within the plan area.
- 3.35 The difference between the plan area's existing capacity and the waste apportionment (i.e. the minimum quantity of waste the plan must accommodate as set out in the 2011 London Plan) is:
- 358,000 tonnes at 2011
 - 458,000 tonnes at 2016
 - 565,000 tonnes at 2021
- 3.36 For planning purposes, these figures have been converted to a landtake using an average throughput per hectare rate of around 60,000 tonnes per hectare. This results in the following landtake requirements:
- 6 hectares at 2011
 - 8 hectares at 2016
 - 10 hectares at 2021
- 3.37 To contribute to this landtake need, it is possible to look towards the redevelopment of some suitable existing waste transfer facilities. The 2011 London Plan encourages the redevelopment of these sites from transfer to facilities which actually manage the waste on site. Given that a priority of the plan is to treat more waste locally, it is logical that, over the plan period, fewer facilities will be needed to transfer waste out of the plan area. This frees such sites up for development as waste management sites.
- 3.38 The accompanying Technical Report (Evidence Base Study 4) and Deliverability Report (Evidence Base Study 3) identify that three existing waste transfer sites are likely to be turned into waste management facilities during the lifetime of this plan with a proposed treatment capacity of 380,000 tonnes.
- 3.39 Subtracting this 380,000 tonnes from the tonnage needed to meet the apportionment (565,000 tonnes) results in a requirement to identify 3.03 additional hectares of land to meet the London Plan's waste apportionment or 4.29 hectares to meet the equivalent of 100% of waste arisings. In accordance with the Waste Plan's vision in Table 4.1, the plan seeks to be net self-sufficient and therefore its 'need' would be addressed by means of the provision of the aforementioned 4.29 hectare figure.
- 0 additional hectares needed in total at 2011
 - 1.3 additional hectares needed in total at 2016
 - 3.03 additional hectares needed in total at 2021 (see Table 3.1) or;
 - 4.29 additional hectares needed in total at 2021 to strive to manage the equivalent of 100% of waste arisings within the plan area (see Table 3.2).
- 3.40 With regard to the type of facilities needed, it is important to consider the plan area's existing facilities, recycling targets and contractual arrangements in place for municipal waste.

7 EA data received November 2010. EA data from Waste Interrogator 2008 and 2009 and updated with information from operators

Table 3.1: Calculating the Landtake Needed to Meet the 2011 London Plan Apportionment Target Years

	2011		2016		2021	
	MSW	C&I	MSW	C&I	MSW	C&I
Apportionments by waste stream	264,187	470,041	321,328	512,683	382,543	558,481
Recycling targets	50%	70%	50%	70%	50%	70%
Recycling capacity needed	132,093	329,029	160,664	358,878	191,271	390,937
Total apportionment	734,228		834,011		941,024	
Total recycling/composting capacity needed	461,122		519,542		582,208	
Existing management capacity	376,187		376,187		376,187	
Gross additional recycling/composting capacity needed	84,935		143,355		206,021	
Proposed new recycling facilities on existing transfer sites with good potential to be delivered within the lifetime of the Waste Plan	140,000		140,000		140,000	
Net additional recycling capacity needed	-55,065		3,355		66,021	
Minimum landtake needed for recycling/composting facilities (average throughput per hectare used: 59,245)	-0.93		0.06		1.11	
Other (non-recycling/composting) need to manage waste	273,106		314,469		358,816	
Existing 'other' management capacity	0		0		0	
Gross 'other' capacity needed to manage waste	273,106		314,469		358,816	
Proposed new 'other' treatment facilities on existing transfer sites with good potential to be delivered within the lifetime of the Waste Plan	240,000		240,000		240,000	
Net additional 'other' needed	33,106		74,469		118,816	
Landtake required for remaining capacity (average throughput per hectare used: 61,951)	0.53		1.20		1.92	
Total capacity shortfall (in tonnes) to meet the apportionment	-21,959		77,824		184,837	
Total landtake (in ha) required to meet the apportionment	-0.40		1.26		3.03	

Table 3.2: Calculating the Landtake Needed to Meet the 2011 London Plan Arisings Target Years

	2011		2016		2021	
	MSW	C&I	MSW	C&I	MSW	C&I
Arisings by waste stream	438,416	556,187	453,891	550,458	468,986	548,441
Recycling targets	50%	70%	50%	70%	50%	70%
Recycling capacity needed	219,208	389,331	226,946	385,321	234,493	383,909
Total arisings	994,604		1,004,350		1,017,427	
Total recycling/composting capacity needed	608,539		612,267		618,401	
Existing management capacity	376,187		376,187		376,187	
Gross additional recycling/composting capacity needed	232,352		236,080		242,214	
Proposed new recycling facilities on existing transfer sites with good potential to be delivered within the lifetime of the Waste Plan	140,000		140,000		140,000	
Net additional recycling capacity needed	92,352		96,080		102,214	
Minimum landtake needed for recycling/composting facilities (average throughput per hectare used: 59,245)	1.56		1.62		1.73	
Other (non-recycling/composting) need to manage waste	386,064		392,083		399,025	
Existing 'other' management capacity	0		0		0	
Gross 'other' capacity needed to manage waste	386,064		392,083		399,025	
Proposed new 'other' treatment facilities on existing transfer sites with good potential to be delivered within the lifetime of the Waste Plan	240,000		240,000		240,000	
Net additional 'other' needed	146,064		152,083		159,025	
Landtake required for remaining capacity (average throughput per hectare used: 61,951)	2.36		2.45		2.57	
Total capacity shortfall (in tonnes) to meet the arisings	238,417		248,163		261,240	
Total landtake (in ha) required to meet the arisings	3.92		4.08		4.29	

- 3.41 There are a number of different recycling and composting facilities across the boroughs but there are currently no disposal facilities within the plan area outside of landfill.
- 3.42 For commercial and industrial waste, the recycling rate exceeds that achieved for municipal waste⁸. For the South London Waste Plan area, more than 50% of commercial and industrial waste is recycled with around 17% disposed of in landfill⁹. In order to achieve recycling targets of 70% for commercial and industrial waste, an additional capacity of around 160,000 tonnes is needed at 2021 to recycle, compost and sustainably dispose of commercial and industrial waste.
- 3.43 For municipal waste, the contractual arrangements described previously for the management of recyclables and compostable waste are in place for the lifetime of this plan. These contracts fulfil the partner boroughs' recycling and composting needs throughout the period of this South London Waste Plan and will enable the partner boroughs to meet the 50% recycling / composting target at 2020. The partner boroughs therefore have no need during the lifetime of this plan for additional recycling and composting facilities.
- 3.44 It should be noted that the kitchen and garden waste collection schemes within the partner boroughs are due to be expanded within the lifetime of this plan. The roll out of additional collection services is due to be completed in March 2012. To accommodate this, Viridor has submitted an application to Sutton Borough Council to build an Anaerobic Digestion plant on their existing operational land at Beddington, Sutton.
- 3.45 With regard to residual municipal waste (that which is currently landfilled at Beddington Farmlands, Sutton), the South London Waste Partnership is now in the latter stages of a procurement exercise to secure a contract for the more sustainable treatment of this waste. This is due to be awarded in 2011 and will enable the partner boroughs to meet their statutory landfill reduction targets thus avoiding the heavy financial penalties for continued reliance on landfill.
- 3.46 Any new facility (or facilities) is expected to be operational by 2014 and the contract will be for a period of up to 30 years. It is anticipated, therefore, that any new treatment facility (or facilities) will be operational until around 2040; well beyond the lifetime of this plan.
- 3.47 For the purposes of the procurement, the South London Waste Partnership is technology neutral and therefore all forms of treatment put forward will be properly and fairly evaluated. In describing the criteria by which the South London Waste Partnership will evaluate proposals for this contract, the partner boroughs state that they will "reward high-performing, low emission, modern, sustainable technologies that offer residents value for money. All boroughs within the Partnership are firmly against poor performing, outdated technologies such as old fashioned, mass burn incineration, which is poorly designed, visually intrusive and releases high levels of noxious emissions. All thermal treatment facilities must meet the requirements of the Waste Incinerator Regulations 2002, to ensure they are operated to high environmental standards." (South London Waste Partnership, 2010).
- 3.48 With regard to sites for residual treatment, in its Outline Business Case to DEFRA to support its case for funding credits, the South London Waste Partnership indicated that the new treatment facility(ies) could be accommodated on existing waste transfer facilities either at Factory Lane, Croydon, Garth Road, Merton or Villiers Road, Kingston. However, it should be noted that the partner boroughs have not ruled out the use of any other suitable sites.

8 Evidence Base Study 4A: Technical Report - Chapter 2

9 DEFRA (2010) Survey of Commercial and Industrial Waste Arisings in 2009

- 3.49 The partner boroughs' transfer facilities have been found to be deliverable for waste treatment facilities and are safeguarded for waste use in Policy WP3 of this plan (see Section 4). It is therefore considered that the South London Waste Plan has accommodated the needs of the partner boroughs with regard to identifying suitable sites for their waste treatment needs.
- 3.50 It is feasible that the redevelopment of any of the partner boroughs' transfer facilities could result in the displacement of other existing facilities on site, notably the boroughs' HWRCs which exist on the three identified transfer facilities. However, until the partner boroughs identify the Preferred Bidder (which will occur at around the time of adoption of this Waste Plan), this is not known. It may be possible for the capacity of any displaced HWRC to be accommodated by intensifying provision at one of the remaining HWRCs. Alternatively, an additional site may be required to provide a new HWRC. In policy terms, the priority locations for any additional HWRC will be those sites identified in policies WP3 and WP4.
- 3.51 Whilst the South London Waste Plan addresses the period 2011 to 2021, it is important to identify any known issues due to emerge shortly beyond the lifetime of this plan. The previous description of the boroughs' arrangements to manage municipal waste identifies that existing contracts for the treatment of kitchen and garden waste, HWRCs and dry recyclables ends in 2022.
- 3.52 Although there is an option for contracts to be extended to 2027, the temporary planning permission for the landfill and associated waste management facilities at Beddington Farmlands, Sutton will expire in 2023. (This will include the expiration of the new 30,000t Anaerobic Digestion facility, should this be awarded planning permission, at Beddington Farmlands). From 2022/2023 therefore, the partner boroughs will have a requirement for additional recycling / composting capacity to meet their needs.
- 3.53 It is recognised that this is beyond the initial lifetime of this plan and is an important issue which will be considered in the latter stages of the plan's monitoring.
- 3.54 In summary, whilst the recycling/composting needs of the boroughs are satisfied by contractual arrangements for the lifetime of this plan, residual treatment for municipal waste is required. In addition, the whole range of recycling, composting and residual treatment facilities is needed for commercial waste. A range of facilities, including type, size and mix of technologies, will therefore be necessary to meet the overall capacity requirements.
- 3.55 Recycling, composting, recovery and processing facilities cover a range of technology types that will have specific site characteristics. A summary of existing and emerging waste technologies is set out in Table 3.3.
- 3.56 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to how much waste the plan must accommodate were:**
- To accommodate the possible need for any additional HWRCs within the lifetime of this plan
 - To provide possible suitable sites for the more sustainable disposal of the partner boroughs' residual municipal waste.
 - To provide suitable sites for the recycling, composting and other treatment of commercial and industrial waste
 - To liaise with the South London Waste Partnership towards the end of the lifetime of this plan to ensure their need for additional recycling/composting facilities after 2022 is accommodated in the next iteration of the South London Waste Plan.
 - To accommodate any additional need for waste facilities to treat other waste streams
- 3.57 These issues are addressed within Policies WP1, WP2, WP3 and WP4 (see Section 4).

Table 3.3 Description of Modern Waste Management Facilities

Summary of existing and emerging waste technologies:
<p>Materials Recovery Facility (MRF) Treat mixed dry, recyclable materials. MRFs identify different waste types (paper, cans etc) and mechanically and/or manually sort and segregate them. Materials are bundled and transported to re-manufacturing facilities, for processing into new products.</p>
<p>Composting Modern composting is covered, takes place in 'in-vessel' composting facilities, with well-regulated airflow to reduce odours.</p>
<p>Mechanical Biological Treatment (MBT) Separates organic material and dry recyclables from mixed waste, recovering the recyclables for the manufacturing industry and the organic element usually for fuel use or composting.</p>
<p>Anaerobic Digestion (AD) A type of composting facility, in the absence of oxygen. AD facilities produce a biogas by-product that can be used as a fuel source to provide renewable energy. AD facilities typically process food waste.</p>
<p>Modern thermal treatment including Pyrolysis and Gasification Thermal treatment facilities use high temperatures to break down waste and can produce energy in the form of heat and power. Modern processes including pyrolysis and gasification use less oxygen than traditional mass-burn incineration and emit fewer air emissions. An advantage of some modern facilities is that they can be designed to be modular; they are made up of small units which can be added or taken away as waste streams or volumes change.</p>

Key Issue 4: Scarcity of Available Land

3.58 In accordance with the Mayor's 2008 London Plan, all designated industrial sites across the four partner boroughs formed the 'area of search' for sites to be allocated in the South London Waste Plan.

3.59 A key requirement for the allocation of these sites within the South London Waste Plan was their deliverability; it was important that allocated sites had a strong likelihood of being developed for waste purposes. To ensure this, local authorities and key stakeholders undertook timely, effective and conclusive discussions on matters of the deliverability of the options of the plan.

3.60 In this context, it is worth noting that for housing purposes national planning guidance¹⁰ describes the deliverability of sites as those which are:

- **Suitable** - whether there are constraints which would make development inappropriate

- **Available** - whether there are any ownership limitations to development

- **Achievable** - whether there are any financial or other limitations to development during the lifetime of the plan

3.61 These criteria were considered suitable for Waste Plan purposes, national policy guidance¹¹ on waste planning advises that waste planning authorities should avoid unrealistic assumptions on the prospects of the land becoming available for the development of waste management facilities having regard in particular to any ownership constraint which

¹⁰ based on PPS3 (DCLG, 2010) para 54

¹¹ PPS10 (ODPM, 2005) para 18

- cannot be readily freed, other than through the use of compulsory purchase powers.
- 3.62 A report on the deliverability of sites was prepared (Evidence Base Study 3: Deliverability) and identified a scarcity of available new sites (i.e. those not already within waste use) within the 10 year period of this plan (2011 to 2021).
- 3.63 This supports the earlier findings of the Mayor of London's Industrial Capacity SPG (GLA, 2008) which concluded that the South London partner boroughs had very little surplus land.
- 3.64 The boroughs' own studies into the availability of land for businesses and industry also identified a scarcity of land available for these purposes with demand outstripping supply, reflected in low turnovers typical across the four boroughs. The boroughs' own studies supported the safeguarding of the majority of industrial land in order to satisfy market demand.
- 3.65 Given this evidence, it was critical that the South London Waste Plan did not unnecessarily designate land for waste planning purposes which will decrease the overall supply of land for other businesses and industry and stifle these important growth areas.
- 3.66 A report commissioned by the South London Partnership (which includes the four partner boroughs) identified strong employment growth and therefore demand for employment land over the plan period.
- 3.67 It was essential therefore that only that land which is needed to meet the partner boroughs' waste management needs was allocated for waste purposes. Overprovision would result in a decreasing supply of land for growing businesses. The supply of land needed for waste management purposes identified in the plan period for this South London Waste Plan reflects the boroughs' waste management needs over the next 10 years. In order to ensure that supply is always related to need,
- this requires monitoring in line with policies WP1, WP2 and WP3.
- 3.68 Because land is scarce, it is also essential that any waste development maximises its throughput, planning constraints permitting.
- 3.69 It should, however, be noted that waste transfer facilities are also assessed under this plan and its policies, but as their capacity does not contribute towards meeting the apportionment or net self-sufficiency, transfer facilities will not be subject to needs testing. Although it is anticipated that there will be a diminishing need for waste transfer facilities (refer to Key Issue 5), if the monitoring system indicated that any one area was subject to too much waste transfer development, at the expense of other employment uses, the borough(s) would address this through research to inform supplementary guidance.

Key Issue 5: Waste Transfer Facilities

- 3.70 Given that the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self sufficiency, the need to transfer waste to facilities outside the plan area will naturally reduce as more facilities are developed.
- 3.71 However, this is likely to take time; time for contractual arrangements governing the movement of waste outside London to expire and for new facilities to achieve planning consent and be operational. In practice, however, most waste sites that operate mainly for the transfer of waste to other areas also have a waste management facility on-site, such as a MRF to assist with sorting. Although the throughput of the waste management facility will contribute towards the boroughs' need as identified in Policies WP1 and WP2, the throughput of the waste transfer facility would make no contribution towards this need.
- 3.72 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples

include the continuing transfer of hazardous waste to a small number of specialist treatment facilities outside London, or the transfer of waste to an existing recycling facility located in close proximity, but just outside the plan area's borders. In addition, when considering the environmental impacts of proposals, the transfer of waste, particularly by rail for example, may result in lower environmental impacts than treating waste in the capital. Although the South London Waste Plan acknowledges that as much waste as practicably possible should be managed within its boundaries, the South London Waste Plan should be sufficiently flexible to support transfer where waste cannot reasonably be treated within the plan area, or where the negative environmental impacts of doing so are greater than other options.

3.73 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to the transfer of waste were:

- To accommodate the diminishing need for waste transfer facilities.
- To accommodate the transfer of waste out of the plan area, where this is more appropriate than managing waste within the plan area.

3.74 These issues are addressed within Policies WP3 and WP5 (see Section 4).

Key Issue 6: Climate Change

3.75 The potential for waste rich in biomass (waste wood and food) to provide a significant contribution to the UK's renewable energy supply has been identified in the UK Renewable Energy Strategy (DECC, July 2009).

3.76 In London, the Mayor also has ambitions to increase the proportion of energy generated from renewable sources¹² and specifies targets for increasing the energy output from anaerobic digestion, pyrolysis and gasification. The energy output from these facilities is considered to be a major opportunity to increase energy generation in London¹³.

3.77 Furthermore, to ensure maximum environmental benefits, national and regional policies encourage heat generated from these waste management processes to be captured for local use. The generation and supply of heat alongside electricity through Combined Heat and Power improves the efficiency of a facility, reducing energy used and thereby lowering carbon emissions. Furthermore, the supply of heat users replaces the need for conventional power generation, thus lowering carbon impacts further.

3.78 Given the importance of minimising greenhouse gas emissions, the Mayor of London supports the provision of heat through decentralised energy networks. At the time of writing, all boroughs within the South London Waste Plan had begun to identify heat users and potentially viable decentralised energy networks. Although this work was at its developmental stages, it was important that the South London Waste Plan supported the provision of waste facilities (notably anaerobic digestion, pyrolysis and gasification facilities) and the distribution of heat and power.

3.79 In response to this evidence, the key issues for the South London Waste Plan to consider in relation to the provision of decentralised energy were:

- To support the development of anaerobic digestion, pyrolysis and gasification facilities where heat and power is provided;
- To encourage the distribution of heat and power through decentralised energy networks.

3.80 These issues are addressed within Policies WP6 and WP8 (see Section 4).

¹² London Plan (GLA, 2011) Policy 5.7

¹³ Climate Change Mitigation and Energy Strategy (GLA, 2010) page 120



Section 4: Vision, Objectives and Policies

- 4.1 The objectives for the South London Waste Plan are set out in the four partner boroughs' Core Strategies. The common objectives set out in each emerging Core Strategy document are that:
- By working in partnership, the four boroughs will seek to maximise net self-sufficiency in managing the waste generated within the four boroughs;
 - The boroughs will identify sufficient land to enable this;
 - The boroughs will be guided by national and regional policy and the potential of strategic industrial locations, local employment areas and existing waste sites for the location of facilities;
 - The boroughs will safeguard existing waste sites and seek to intensify their development as waste management facilities where appropriate; and,
 - The boroughs will support the recycling and composting of waste by requiring that new developments provide space to enable the storage and collection of recyclables.
- 4.2 To address these objectives, the partner boroughs have identified a Vision and Objectives for the South London Waste Plan. These were originally consulted upon during the 2008 Issues and Options consultation. Feedback received during that time has been incorporated into the Vision and Objectives for the South London Waste Plan, shown in Table 4.1.
- 4.3 The Vision and Objectives will be delivered through a number of policies which guide development to specified areas or sites and set out criteria that must be taken into account by the boroughs when determining proposals for waste development. Since the South London Waste Plan is a joint plan, the policies will be used by all partner boroughs (Croydon, Kingston, Merton and Sutton) when assessing applications for waste management facilities.

Table 4.1 Vision and Objectives for the South London Waste Plan

Vision

By 2021, the South London Waste Plan area will have sufficient waste management facilities, in appropriate locations, to meet the identified needs of our communities. The area will be striving for net self-sufficiency in sustainable waste management.

Objectives

Through the South London Waste Plan, the partner boroughs of Croydon, Kingston, Merton and Sutton will:

- Promote waste minimisation, preparing for re-use and recycling in line with reducing net carbon emissions and the waste hierarchy. Where waste cannot be recycled or composted, the maximum value will be recovered from that residual waste.
- Reduce the climate change impacts of waste management by encouraging waste to be managed close to its source, sustainable forms of transport and exemplary standards of sustainable design and construction.
- Identify enough land within the partner boroughs of Croydon, Kingston, Merton and Sutton to enable the development of sufficient new waste management facilities to manage the London Plan apportionment figure within the plan's area. To support this, the boroughs will safeguard existing waste sites and maximise the use of these, where appropriate.
- Minimise adverse impacts on people and the local environment, taking climate change into account, by having waste facilities in suitable locations, using the best available technologies and ensuring the highest standards of design and layout.
- Involve local communities and other stakeholders in decision making.
- Support the relevant key aims and objectives of Croydon, Kingston, Merton and Sutton's Sustainable Community Strategies and Local Development Frameworks and the Joint Municipal Waste Management Strategy.

Policies Applicable in the Consideration of Proposals

4.4 In assessing applications, besides the policies of this plan, consideration will also be given to national and regional guidance, the "saved policies" of the Unitary Development Plan of the relevant borough and the adopted and emerging policies of each borough's Local Development Framework. In addition, an Environmental Impact Assessment may also be a statutory requirement.

Development of Policies through Consultation Stages

4.5 At the second consultation stage of the Waste Plan's production¹, the consultation document included seven policy issues on which stakeholders could comment. Following the receipt of responses and in order to make the document more user friendly, the policies have been amended and re-ordered. There are now two strategic policies, dealing with waste demand and land supply across the four boroughs. Three policies deal with site safeguarding and development and four policies are concerned with development management issues.

4.6 Table 4.2 provides a guide as to how the policies within this document relate to the policies in the Preferred Options document.

Table 4.2: Changes to Policy Format from the Stage 2 Consultation on Potential Sites and Policies

Adopted Policy	Stage 2 Consultation Policy
Strategic Waste Policies:	
WPI Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste	First part of WPI and amendments following consultation and additional technical data
WP2 Strategic Approach to Other Forms of Waste	Second part of WPI , amendments and additions following consultation
Site Location Waste Policies:	
WP3 Existing Waste Sites	WP3 and amendments following consultation
WP4 Industrial Areas with Sites Suitable For Waste Facilities	WP4 and amendments following consultation
WP5 Windfall Sites and Non MSW and C&I Waste Location Criteria	WP5 and amendments following consultation
Detailed Waste Policies:	
WP6 Sustainable Construction of Waste Management Facilities	WP2 and amendments following consultation
WP7 Protecting and Enhancing Amenity	Part of WP6 with additions and amendments following consultation
WP8 Sustainable Energy Recovery	WP7 and amendments following consultation
WP9 Planning Obligations	New: To conform to national guidance - see Para B25 of Circular 05/05 and Para 4.47 of PPS12: Local Spatial Planning

¹ Potential Sites and Policies, July 2009

Superseded Policies

- 4.7 The policies of the South London Waste Plan supersede any borough-level policies which still exist within the partner borough's Unitary Development Plans (UDPs). Table 4.3 identifies the borough policies which the policies of the South London Waste Plan replace.

Delivery and Monitoring of Policies

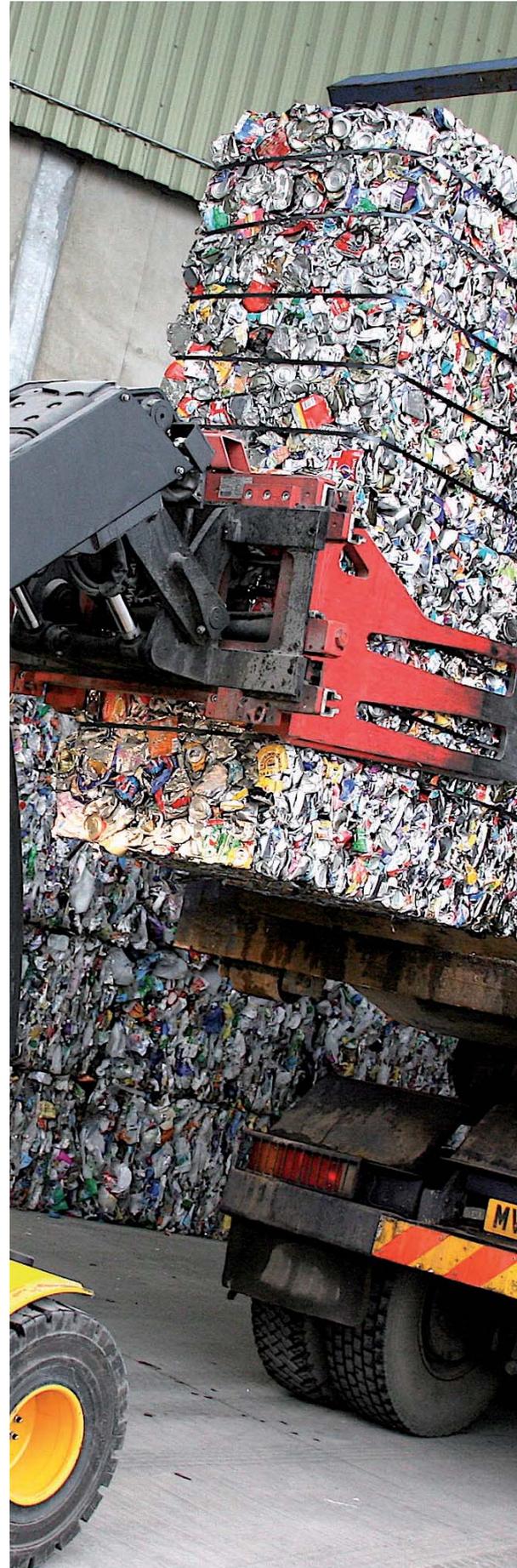
- 4.8 The implementation of the policies within the South London Waste Plan will require partner boroughs to work with a range of partners to deliver appropriate waste facilities within the plan area. Key partners in the delivery of the South London Waste Plan are the waste management industry, the South London Waste Partnership and the Environment Agency. The waste management industry has a critical role in bringing forward applications and the construction and operation of local waste facilities. The South London Waste Partnership is responsible for procuring contracts to treat the partner boroughs' municipal waste and for implementing waste minimisation strategies. The Environment Agency is responsible for awarding permits to waste management facilities.
- 4.9 The monitoring of the South London Waste Plan will take place via each borough's monitoring and reporting processes. Much of the data required for the monitoring function is available either from the Environment Agency or from the boroughs' monitoring of their own planning permissions, refusals or applications. The boroughs intend to monitor policy performance from when Kingston's Full Council approved the document on 7 December 2010. However, due to the current volatility both in terms of the throughput of waste management facilities and the number of applications for waste management coming forward, the boroughs will only draw conclusions on policy performance on the basis of three-year rolling averages. The approach is designed to mitigate against exceptional monitoring returns in one year.

Table 4.3: UDP Policies Superseded by South London Waste Plan Policies

Borough	Policy Reference	Policy Description
Croydon	SPI 1: Opportunities for Waste Management Facilities	Strategic policy
Croydon	EP8: Waste and Recycling	Strategic policy governing the location of waste management facilities
Croydon	EP9: Waste and Recycling	Safeguarding against loss of existing waste management facilities
Kingston	MWI: Development of Waste Management Facilities	Strategic policy governing the location of waste management facilities
Merton	PE9: Waste Minimisation and Waste Disposal	Requires major new industrial developments to minimise waste
Sutton	PNR20: Sites for Waste Related Development	Policy identifying the location of waste management facilities

Table 4.4: Schedule of Policies

Strategic Waste Policies	
WP1	Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste
WP2	Strategic Approach to Other Forms of Waste (a) Construction, Demolition and Excavation Waste (b) Hazardous Waste (c) Agricultural Waste (d) Clinical Waste (e) Radioactive Waste (f) Waste Water
Site Location Waste Policies	
WP3	Existing Waste Sites
WP4	Industrial Areas with Sites Suitable for Waste Facilities
WP5	Windfall Sites and Non MSW and C&I Waste Location Criteria
Detailed Waste Policies	
WP6	Sustainable Construction of Waste Facilities
WP7	Protecting and Enhancing Amenity
WP8	Sustainable Energy Recovery
WP9	Planning Obligations
Schedules	
Schedule 1	Existing Permitted Waste Sites, as safeguarded by the 2011 London Plan
Schedule 2	Industrial Areas with Sites Suitable for Waste Facilities
Schedule 3	Information Which may be Required for a Planning Application



Strategic Waste Policies

WPI: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste

Additional Waste Capacity

- 4.10 PPS10 "Planning for Sustainable Waste Management" (para 17) requires that the South London Waste Plan identifies sites and areas suitable for the waste management facilities that support the apportionment for Municipal Solid Waste and Commercial and Industrial Waste as set out in the relevant Regional Spatial Strategy (RSS), in this case the London Plan (2011).
- 4.11 The apportionment is a quantity (tonnes per annum) of Municipal Solid Waste and Commercial and Industrial Waste which the London Plan has allocated to each London borough. The apportionment is not a measure of the amount of waste arising in a borough but a share of the capital's total waste which each of London's 33 boroughs must manage. The apportionment is calculated according to each borough's ability to manage waste and some boroughs have been found to have a greater capacity to manage waste than others (mainly due to the availability of suitable land). Therefore, boroughs must allocate enough land to meet the apportionment figure, as stated in the 2011 London Plan, even if some waste generated within a plan area is treated outside the area.

- 4.12 Table 4.5 shows the apportionment for the four boroughs of the South London Waste Plan.

Identifying landtake

- 4.13 For land use planning purposes, the additional waste management capacity identified must be translated into an area of land. This enables sufficient land to be allocated to enable the development of enough new and/or enhanced waste management facilities to meet the additional waste management capacity needs. Need is the total waste arisings. Waste transfer facilities do not contribute to meeting need as defined in this plan or the London Plan.
- 4.14 'Key Issue 3 (What number and range of waste facilities are needed?)', which features earlier within this document, provides an overview of how the landtake need has been calculated from the apportionment figure. Furthermore, the Technical Report (Evidence Base Study 4) details the rationale for calculations made.
- 4.15 To summarise, the South London Waste Plan must safeguard existing waste sites and identify capacity for an additional 184,837 tonnes (approximately 3.03 additional hectares of new sites) not already in waste management in order to meet the 2011 London Plan apportionment, plus an additional 1.26 hectares to meet the equivalent of 100% of the Waste Plan area's waste arisings by 2021.

Table 4.5: 2011 London Plan Apportionments

Boroughs	% of London total waste	Municipal Solid Waste (tpa) at 2021	Commercial & Industrial (tpa) at 2021	Total waste to manage at 2021
Croydon	3.0%	114,707	167,463	282,258
Kingston	1.7%	66,106	96,510	162,667
Merton	2.9%	110,296	161,023	271,404
Sutton	2.4%	91,434	133,486	224,989
Waste Plan Area	10.0%	382,542	558,481	941,318
Greater London Area	100%	3,816,000	5,568,000	9,387,000

- 4.16 Given the scarcity of land available to businesses and industry, it is considered critical that the South London Waste Plan does not facilitate the overprovision of waste management facilities. Key Issue 4 (Scarcity of Available Land), described earlier within this plan, identifies that demand for industrial land for businesses exceeds supply within the South London Waste Plan area. In order to safeguard land for a wide range of economic activity, it is critical that proposals for waste management development are related directly to the plan area's need for waste management facilities. To facilitate our understanding of this, the additional waste management capacity required to meet the plan area's need has been thoroughly examined in the accompanying 'Evidence Base Study 4: The Technical Report' and will be updated annually through each borough's monitoring and reporting processes.
- 4.17 Therefore, in accordance with PPS10, the 2011 London Plan and this plan's objectives:

WPI: Strategic Approach to Municipal Solid Waste and Commercial and Industrial Waste

The boroughs of the South London Waste Plan will work with the waste management industry to monitor the need and opportunity for sites. Proposals will be required to meet the apportionment requirements of the 2011 London Plan and any subsequent target.

During the lifetime of the plan, the boroughs will seek to exceed the apportionment target and strive to attain net self-sufficiency in managing the waste generated by the four boroughs. The requirements of the Waste Plan area are therefore to provide sufficient capacity to manage:

- a minimum of 834,011 tonnes of waste by 2016 to meet the 2011 London Plan apportionment and strive to provide 1,004,350 tonnes of capacity in total to meet our waste management needs by 2016.
- a minimum of 941,024 tonnes of waste by 2021 to meet the apportionment and strive to provide 1,017,427 tonnes of capacity in total to meet our waste management needs by 2021.

The partner boroughs of Croydon, Kingston, Merton and Sutton will deliver this by safeguarding existing capacity and encouraging intensification of sites (Policy WP3) where this meets all other policy requirements of the Waste Plan.

Development to meet the additional capacity needs will be within the industrial areas identified in Policy WP4, provided they meet the other policies within this South London Waste Plan and relevant policies from the appropriate borough's Development Plan.

Development to meet the additional capacity needs will be permitted if it seeks to reduce net carbon emissions by managing waste as high up the waste hierarchy as practically possible. All development should safeguard existing communities and the environment by meeting other policies within the relevant borough's Development Plan.

The additional waste management capacity needed throughout the plan period will be monitored on a yearly basis through each borough's monitoring and reporting processes.

WP2: Strategic Approach to Other Forms of Waste

- 4.18 This policy is to address all other forms of waste, including those referenced below, which are found in the plan area.

Construction, Demolition and Excavation Waste

- 4.19 Data for this waste stream is only available for London as a region. Borough level data is not available. The most recent data from 2005² estimates that of the 8 million tonnes of Construction, Demolition and Excavation Waste produced in the capital, almost 5 million tonnes was recycled, 2 million tonnes was spread on registered exempt sites and only 1 million tonnes was disposed of at landfill.
- 4.20 Nevertheless, 2011 London Plan Policy 5.16 requires that more than 95% of the capital's Construction, Demolition and Excavation Waste is recycled and reused by 2020 and the Department for Business, Enterprise and Regulatory Reform's Strategy for Sustainable Construction (June 2008) requires a 50% reduction in the amount of Construction, Demolition and Excavation Waste going to landfill by 2012 compared to 2008.
- 4.21 To meet the regional policy target, it is estimated that 32,000-36,500 tonnes of Construction, Demolition and Excavation Waste needs to be diverted from landfill by 2011 and a further 1,200-2,350 tonnes will need to be diverted by 2021.
- 4.22 It is therefore anticipated that there is a small requirement for additional Construction, Demolition and Excavation Waste capacity. However, this need is likely to fluctuate over the plan period depending on the granting and implementation of planning permissions and economic circumstances, consequently, there is flexibility built into the plan by allowing additional capacity to come through the windfall sites policy (Policy WP5). Any application for a new waste facility that manages Construction,

Demolition and Excavation Waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

Hazardous Waste

- 4.23 The definition of hazardous waste includes substances that are commonly found in the Municipal Solid Waste, Commercial and Industrial (eg waste electronic and electrical equipment) and Construction, Demolition and Excavation (eg asbestos and contaminated soils) waste streams. Hazardous wastes are routinely separated from these waste streams for specialist treatment.
- 4.24 The amount of hazardous waste produced within the plan area is small (16,000 tonnes in 2006) and recent trends show an overall decline in this waste stream since 1999³. It is not anticipated that additional capacity will be needed within the plan area to treat hazardous waste. However, should arisings increase in the future, there is flexibility built into the Waste Plan through allowing for the provision of windfall sites. Any application for a new waste facility that treats hazardous waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

Agricultural Waste

- 4.25 The most recent Environment Agency data on agricultural waste (waste and by-products arising on farms consisting of organic matter such as manure, slurry, silage, effluent, crop residues and non-organic materials) shows that only 35,000 tonnes of agricultural waste was produced in London. There is no borough level data available, though the amount of agricultural waste produced within the plan area is anticipated to be negligible. The majority of biodegradable

2 Survey of Arisings and Use of Alternatives to Primary Aggregates in England (DCLG, 2005)

3 Special Waste Database (EA, 2004)

waste produced is composted and used on the land and other agricultural waste is treated as any other commercial or industrial waste, collected and treated by private contractors. By safeguarding the existing waste facilities in the borough through Policy WP3, any agricultural waste arising within the borough can continue to be transferred and/or treated in the current manner.

- 4.26 It is not anticipated that additional capacity will be needed within the plan area to treat agricultural waste. However, should arisings increase in future, there is flexibility built into the plan through allowing for the provision of windfall sites. Any application for a new waste facility that treats agricultural waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

Clinical Waste

- 4.27 The responsibility for the appropriate disposal of clinical/hazardous waste falls to the producer of the waste as per the definition in the Environmental Protection Act 1990 Section 34 Duty of Care: "anyone whose activity produces waste, or anyone who carries out pre-processing, mixing or other operations resulting in the change in the nature of composition of this waste." Producers can be identified as, but not limited to, the following: Acute and Foundation Trusts, local healthcare providers, Ambulance Trusts, Mental Health Trusts, veterinary practices, dentistry, opticians, podiatry, general practices, pharmacies, residential homes with and without nursing care, research facilities, private and independent healthcare, other non-health practices producing healthcare waste (eg: tattooists and body piercers), complementary and alternative treatments and voluntary organisations.
- 4.28 Each organisation or individual has a responsibility to ensure the safe disposal of clinical/hazardous waste produced as a result of their activity. The arrangements for this disposal must comply with the Environmental Protection Act 1990 inclusive of the Duty of Care Regulations 1990. Local policies and procedures, such as Infection Control Policies and Waste Management Policies, will further develop the assurance of compliant disposal of waste and allocate the appropriate risk thus determining the method of disposal (Health Technical Memorandum 07-01: Safe management of healthcare waste).
- 4.29 Local arrangements may vary however. For the majority, an Environment Agency authorised contractor is used to ensure waste is transported and disposed of adequately. In the plan area, local healthcare providers use a third party contractor for the above purpose with management facilitated by the Support Services Partnership SW London (hosted by NHS Wandsworth). Acute and Foundation Trusts within the area have similar arrangements. Local authorities have an obligation to dispose of clinical waste generated by the community but have no obligation to transport it to a disposal facility. The Environmental Protection Regulations 1991 empowers the local authority to charge a reasonable fee for the transport of this waste. This charge may include administrative fees in accordance with the Duty of Care Regulations 1991.
- 4.30 At present, healthcare waste is transported to disposal facilities outside south west and south east London, although this is dependent on the authorised contractor utilised. Some waste arisings may be transported temporarily to transfer facilities prior to the final disposal facility. This is done simply for operational reasons and to manage capacities appropriately. As such, it is considered that the capacity for the safe disposal of clinical/hazardous waste is sufficient. However, any application for a new waste facility that treats clinical waste will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan and subject to scrutiny, approval and permitting by the Environment Agency.

Radioactive Waste

- 4.31 Radioactive waste is a waste stream that generates particular concerns. Waste containing radioactive material is usually the product of a nuclear process, such as nuclear fission, though industries not directly connected to the nuclear power industry, such as hospitals and laboratories may also produce radioactive waste. Radioactive waste requires treatment in specialist facilities. Existing European legislation covers radioactive waste and sets out the standards for the health protection of the general public and workers against the dangers of ionising radiation. The Radioactive Substances Act 1993 consolidates earlier provisions. It provides that "no person may keep or use radioactive material on premises used by that person for carrying on an undertaking without registration unless exempted from registration". Control is exercised by the Environment Agency, under consultation with the Department for Environment, Food & Rural Affairs (DEFRA) and the Health and Safety Executive (HSE).
- 4.32 The Environment Agency holds no borough level data on the occurrence of radioactive waste. However, since there are no nuclear power plants within the partner boroughs, it is not expected that this waste occurs in any significant volumes within the plan area. Therefore, the South London Waste Plan will not make any provisions for this waste stream.

Waste Water

- 4.33 The four boroughs of the South London Waste Plan are served by a number of sewage treatment works, including Beddington, Hogsmill, Crossness and Longreach. However, only Beddington (Sutton) and Hogsmill (Kingston) Sewage Treatment Works are located within the plan area whereas the others fall outside.
- 4.34 The adopted Sutton Core Strategy makes reference to the need to increase treatment capacity to serve additional catchment growth at the Beddington Sewage Treatment Works and the Kingston Core Strategy (Preferred Options) proposes to designate

Hogsmill Sewage Treatment Works as a Major Developed Site within the Green Belt to facilitate expansion and improvement to the works to cope with new development within its catchment area.

- 4.35 As the Landfill Directive has introduced a ban on the disposal of liquids to landfill facilities, this may result in additional pressure to find available space within operational sewage treatment works to manage liquid wastes that were previously disposed of through landfill. Any application for a new liquid waste management facility will be determined in accordance with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.
- 4.36 Therefore, in accordance with European and national legislation, the 2011 London Plan and this plan's objectives:

WP2: Strategic Approach to Other Forms of Waste

Planning permission for additional facilities for other waste streams, including Construction, Demolition and Excavation Waste, Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste and Waste Water, will be permitted, provided that:

- (a) there is an identified need for such a facility within the South London Waste Plan area, which cannot be met through existing waste facilities or the adaptation of existing waste facilities; and,
- (b) the proposals meet the other policies of this South London Waste Plan together with all other relevant policies of the appropriate borough's Development Plan.



Site Location Waste Policies

WP3: Existing Waste Sites

- 4.37 The loss of appropriate sites to other development will make waste recycling, diversion and recovery targets harder to achieve. Therefore, national and regional policy recognises local authorities have a responsibility to safeguard the current list of existing waste sites and allocate appropriate sites for the development of new and/or enhanced future waste management facilities⁴.
- 4.38 However, national guidance also asks local planning authorities to consider whether it is necessary to allocate a site and to consider whether a site is critical to place-making⁵. Some of the existing waste management sites with Environment Agency permits are very small concerns, such as skip hire operators and spare car parts dealers, and contribute a negligible proportion of the overall existing capacity. Furthermore, when located outside the Strategic Industrial Locations (SILs) or Locally Significant Industrial Locations (LSILs), these businesses can often be bad neighbours to surrounding land uses. Consequently, it is considered pragmatic to safeguard all existing waste sites within the plan area's SILs and LSILs but only those sites with a site area of 0.2ha or larger outside of the above areas. A site area of 0.2ha has been chosen since regional studies of waste facilities⁶ and the Technical Report of this plan suggest it is the threshold above which significant throughput amounts can be achieved.

4 PPS10 (ODPM, 2005) para 11 and London Plan (GLA, 2011) Policy 5.17

5 PPS12 (CLG, 2008), para 5.1 and Planning Advisory Service guidance on allocating sites:
<http://www.pas.gov.uk/pas/core/page.do?pageId=469051>

6 Recycling and Recovery Facilities - A Site Investigation in London (GLA, 2005) and Rubbish In Resources Out - Design Ideas for Waste Facilities in London *GLA, 2008)

- 4.39 Therefore, Schedule 1, accompanying this policy, details the existing waste sites within the plan area which are to be safeguarded. The boroughs' monitoring processes will provide an update to Schedule 1 which will incorporate new waste sites that are delivered during the lifetime of this plan.
- 4.40 Where redevelopment or conversion from transfer to management is anticipated, Schedule 1 also identifies the sites that are likely to be developed in the period 2011 to 2016 and more details regarding these sites, such as a site plan and description, are provided in Section 5.
- 4.41 New waste sites that are within SILs and LSILs and new waste sites outside SILs and LSILs with a site area of more than 0.2ha will also be safeguarded. New waste sites will be added to Schedule 1 as relevant planning permissions are implemented and will be updated annually through the boroughs' monitoring processes.
- 4.42 In general conformity with London Plan Policy 5.17, if, for any reason, an existing waste site is lost to a non-waste use, additional compensatory provision will be required, normally meeting the maximum throughput that the site could have achieved.
- 4.43 The boroughs recognise that approximately 380,000 tonnes of capacity, currently landfilled and managed by Viridor at Beddington Farmlands, will not be available following the expiry of temporary planning permissions in 2023. This is beyond the plan period but requires consideration during the lifetime of the plan. There are a number of variables that could affect the extent of future compensatory provision required, notably the final terms of the South London Waste Partnership contract, new forms of waste collection, new facilities and new waste technology. The boroughs will assess future need through their monitoring processes.
- 4.44 In addition, 2011 London Plan Policy 5.17 requires the safeguarding of existing landfill sites. The plan area has one landfill site at

Beddington (Sutton) and this is licensed for the lifetime of this plan. It is included in Schedule 1.

- 4.45 Therefore, in accordance with PPS10, London Plan Policy 5.17 and this plan's objectives:

WP3: Existing Waste Sites

All existing permitted sites (except those with a site area of 0.2ha or less that are located outside SILs and LSILs) will be safeguarded for their current use or conversion to waste management. The current list (2011) is set out in Schedule 1.

These sites will be encouraged to maximise their potential, provided that proposals satisfy all other policy requirements of this South London Waste Plan. Proposals must also satisfy any other relevant policies within the applicable borough's Development Plan.

If, for any reason, an existing site is lost to a non-waste use, replacement compensatory provision will be required that, as a minimum, meets the maximum throughput that the site could have achieved. Any compensatory provision will need to comply with the policies of this South London Waste Plan together with any other relevant policies within the applicable borough's Development Plan.

In accordance with the plan's objectives and Policy WPI, if a redevelopment results in waste being treated higher up in the waste hierarchy but leads to a reduction in overall throughput, permission may also be granted.

Schedule I: Existing Permitted Waste Sites, as Safeguarded by the 2011 London Plan

Site Ref	Site Name	Borough	Likely timescale for redevelopment
Metal Recycling Facilities			
22	B Nebbett & Son, Ellis Road, Willow Lane Industrial Estate	Merton	
23	Five Star Japanese Auto Spares, Unit 1-2 Weir Road	Merton	
100	European Metal Recycling Ltd, Therapia Lane, Beddington	Sutton	
Household Waste and Recycling Sites			
2	Fishers Farm HWRC, North Downs Road, New Addington	Croydon	
3	Kimpton Road HWRC, Kimpton Park Way, Sutton	Sutton	
4	Purley Oaks HWRC, Brighton Road, West Croydon	Croydon	
26	Weir Road HWRC, Weir Road, Wimbledon	Merton	
Sites Hosting Household Waste and Recycling Sites and Borough Transfer Stations			
1	Factory Lane Transfer Station, Factory Lane, Croydon	Croydon	2011-2016
6	Villiers Road HWRC, Chapel Mill Road, Kingston	Kingston	2011-2016
9	Garth Road HWRC, Garth Road, Morden	Merton	2011-2016
Physical Treatment Facilities			
18	Viridor Recycling and Composting Centre (also known as CIC), Beddington Lane, Beddington*	Sutton	2011-2016
21	777 Recycling Centre, Coomber Way, Beddington	Sutton	
101	Rentokil Initial Services Ltd, 46 Weir Road	Merton	
A	Safety Kleen UK Ltd, Unit B6, Redlands, Coulsdon	Croydon	
V	Vertal, Willow Lane, Mitcham	Merton	
Waste Transfer Sites			
5	Pear Tree Farm Waste Transfer Station, Featherbed Lane, Addington	Croydon	
17	Country Waste Recycling Ltd, (also known as One51 ES Recycling UK (South) Ltd) Beddington Lane, Beddington	Sutton	2011-2016
19	SE Skips/Waste World Ltd, Willow Lane	Merton	
25	Sloane Demolition, Amenity Way, Morden	Merton	
27	SITA Transfer Station, Weir Road, Wimbledon	Merton	2011-2016
97	Sevenside Waste Paper, Beddington Lane, Beddington	Sutton	
98	Croydon Transfer Station, Endeavour Way, Beddington	Sutton	
126	Benedict Wharf Transfer Station (also a small MRF on site), Hallowfield Way, Mitcham	Merton	2011-2016
B	Stubbs Mead Depot, Factory Lane	Croydon	

Schedule I: Industrial Areas with Sites Suitable for Waste Facilities (continued)

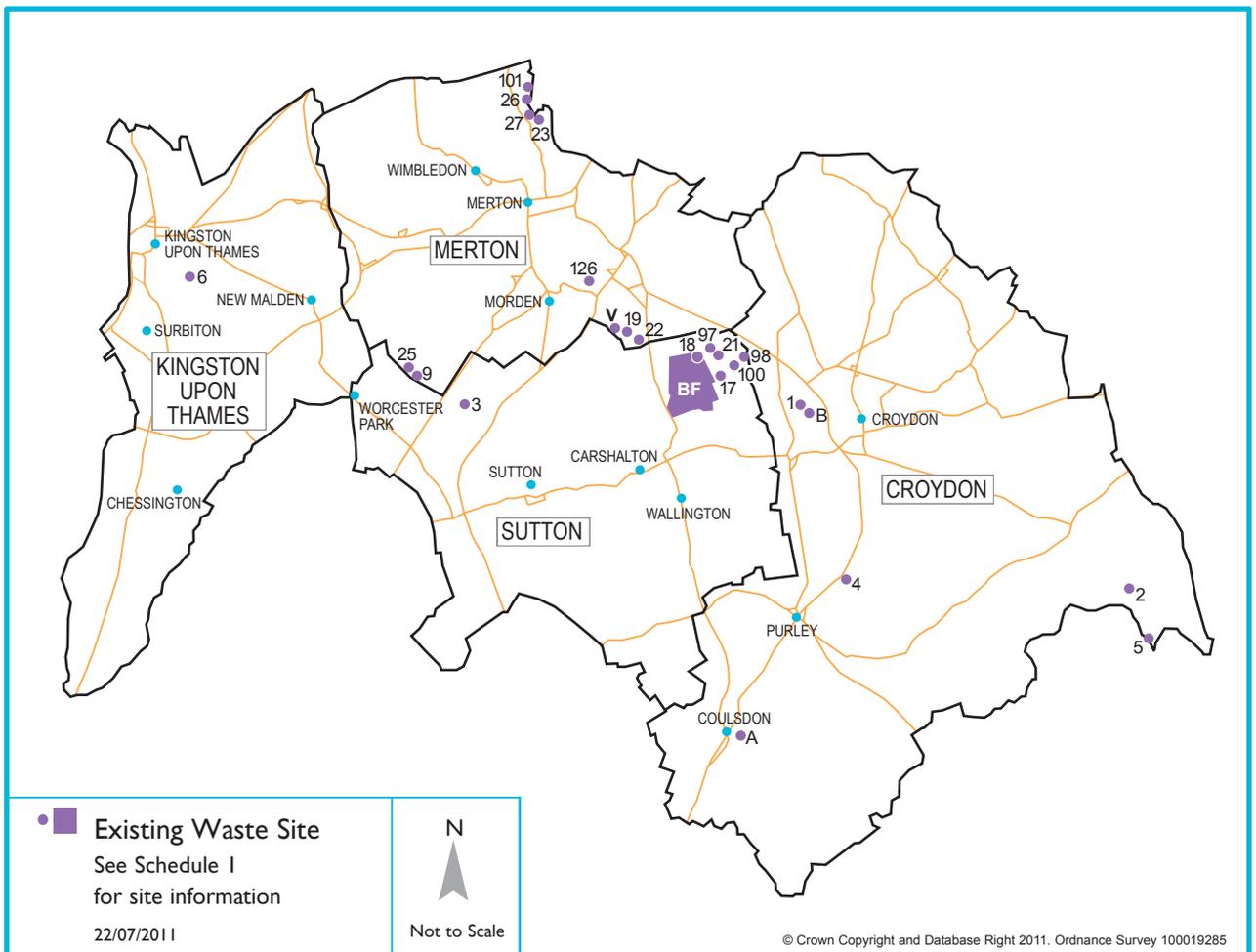
Site Ref	Site Name	Borough	Likely timescale for redevelopment
Other Waste Facilities			
BF	Thames Water Services Ltd, Beddington Farmlands Landfill, Beddington Lane Beddington*	Sutton	

Source: The Environment Agency (June 2010)

Sites will appear as safeguarded for waste uses on the relevant borough's Proposals Map

* These sites are subject to temporary planning permissions or resolutions to grant temporary planning permissions. All are due to expire in 2023. After this, the land will be incorporated into the Wandle Valley Regional Park.

Figure 4.1: Location of Existing Waste Management Sites as set out in Policy WP3, Schedule I



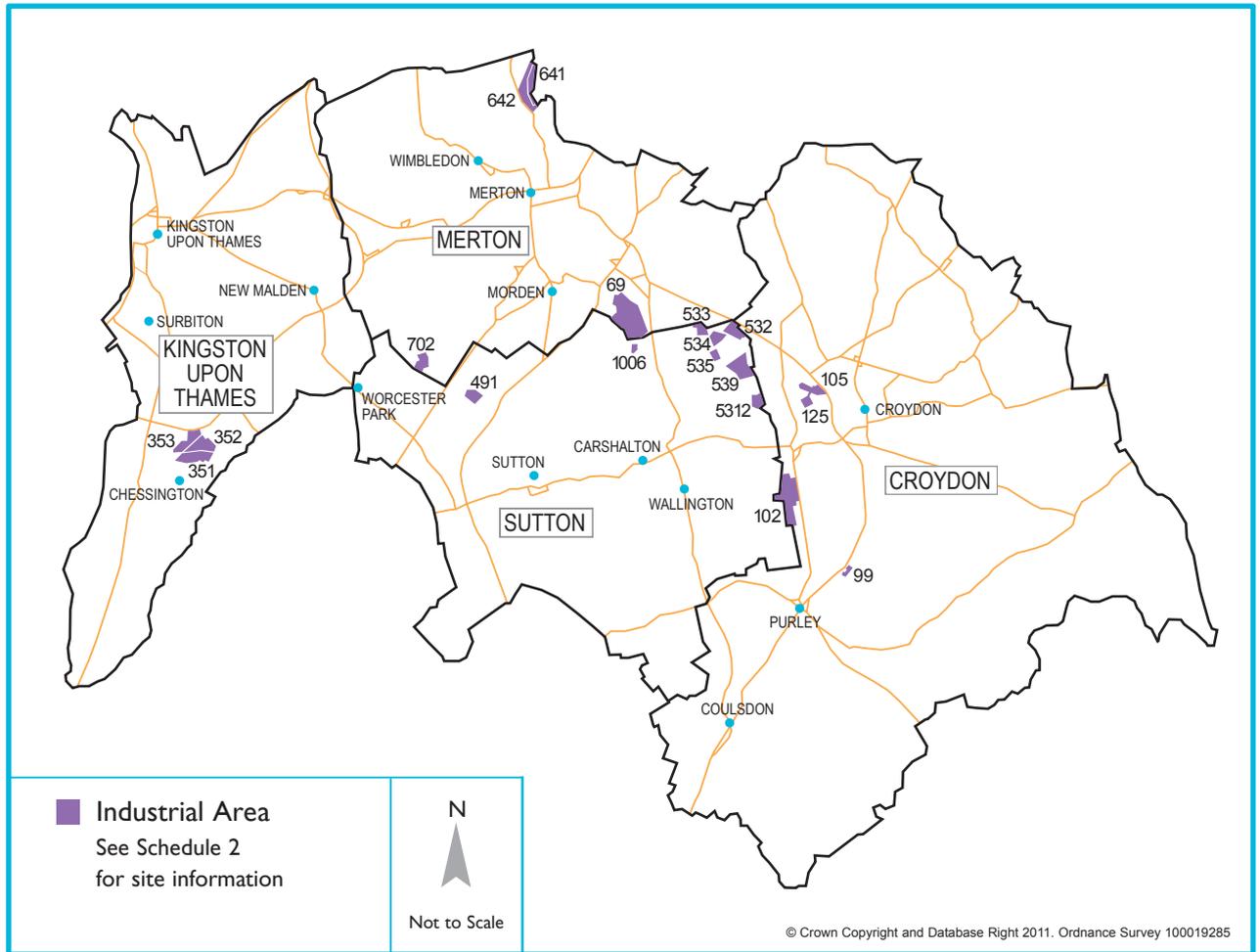
Schedule 2: Industrial Areas with Sites Suitable for Waste Facilities

Waste management development will be permitted on a limited amount of land, in accordance with the Waste Plan's capacity needs identified in Policy WPI (up to a total of 261,240 tonnes of capacity [or approximately 4.29 hectares] as calculated in 2011) on a single or multiple sites within the following industrial areas:

Site Ref	Site Name	Borough	Likely timescale for redevelopment
69	Willow Lane Industrial Area	Merton	2017-2021
99	Croydon Purley Oaks Highways Depot	Croydon	2017-2021
102	Purley Way, Lysander Road and Imperial Way Industrial Area	Croydon	2017-2021
105	Factory Lane Industrial Estate	Croydon	2017-2021
125	Croydon Factory Lane (South Side)	Croydon	2017-2021
351/352 /353	Chessington Industrial Area	Kingston	2017-2021
491	Kimpton Industrial Estate, Land north of Minden Road	Sutton	2017-2021
641/642	Durnsford Road Industrial Area	Merton	2017-2021
702	Garth Road Industrial Area	Merton	2017-2021
1006	The Wandle Valley Trading Estate (part of)	Sutton	2011-16
5312/532/533/ 534/535/539	Beddington Industrial Area	Sutton	2017-2021

The areas will appear as suitable for waste facilities on the relevant borough's Proposals Map

Figure 4.2: Location of Industrial Areas with Sites Suitable for Waste Management Facilities as set out in Policy WP4, Schedule 2



WP4: Industrial Areas with Sites Suitable for Waste Facilities

- 4.46 Planning Policy Statement 10 "Planning for Sustainable Waste Management" requires the South London Waste Plan to identify sites and areas suitable for new or enhanced waste management facilities, in accordance with the broad locations identified in the Mayor's London Plan⁷.
- 4.47 2011 London Plan Policy 5.17 identifies the broad locations suitable for recycling and waste treatment facilities as strategic industrial locations, local employment areas and existing waste management sites. These categories formed the area of search for sites at the start of the development of the South London Waste Plan in 2008. Additional sites were also identified through the 2008 and 2009 consultations.
- 4.48 PPS10 (Annex E) and 2011 London Plan Policy 5.17 also set out locational criteria for waste management facilities. Following the Issues and Options Consultation on this document, around 140 sites were identified and these were evaluated on the basis of a number of criteria, primarily derived from PPS10 and the London Plan but also adapted to take into account specific characteristics of the plan area.
- 4.49 The site evaluation process comprised three elements: absolute constraints (or "showstoppers"), constraints/opportunities and site assessment. The absolute constraints included: Sites of Special Scientific Interest, Special Areas of Conservation, Special Protection Areas, Ramsar Sites, National Nature Reserves, World Heritage Sites, Scheduled Ancient Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields, Registered Parks and Gardens and greenfield sites located within Flood Zone 3b.
- 4.50 The constraints were identified as: Green Belt or Metropolitan Open Land, Open Space, Flooding, Groundwater Source Protection Zones, Public Rights of Way, Local Conservation Areas, Nature Conservation Areas, Locally Important Nature Conservation Areas, Archaeology and Strategic Views. The opportunities included: Major Developments/Regeneration Sites, Sustainable Transport and the Road Network.
- 4.51 The Site Assessment comprised: Site Configuration, Existing Uses/Buildings on Site, Proximity to Residential Areas, Schools and Hospitals, Routing of Vehicles to Site, Visual Intrusion, Existing Ambient Air Quality, Traffic Generation and Co-Location Potential. The Potential Sites Technical Report (July 2009) on the site selection process provides further details of how the sites were evaluated.
- 4.52 In addition to the site evaluation, other factors were also considered such as responses to earlier consultations and further evidence gathering. Additional evidence, which is available in the supporting documents, included the evaluation of sites against the sequential test in Planning Policy Statement 25: "Development and Flood Risk", a consideration of the environmental impacts which the development of a site could cause and the Sustainability Appraisal. In addition, all the potential sites were evaluated for deliverability based on the criteria of:
- Suitability - whether there are constraints which would make development inappropriate
 - Availability - whether there are any ownership limitations to development
 - Achievability - whether there are any financial or other limitations to development during the plan's lifetime
- 4.53 As noted previously, the plan area's industrial and employment land is in high demand compared to many other regions of London. The competition for land in the industrial areas was illustrated by the Deliverability of Sites Report (Evidence Base Study 3) where a large number of potential sites were identified as "unavailable" during the initial lifetime of this plan. The poor availability of industrial sites meant that insufficient sites were identified to accommodate the

equivalent of 100% of waste arisings, which is what the South London Waste Plan strives for. Therefore, it was considered the additional 261,240 tonnes of capacity (approximately 4.29 hectares) could be delivered from sites within broader industrial areas.

- 4.54 These industrial areas are locations which currently have deliverability constraints (often relating to land ownership and land assembly) but, in the boroughs' assessment as set out in the Deliverability Study, are the most suitable areas for waste facilities. These areas are intended to signal to potential waste management facility developers where the boroughs could envisage further waste facility development. The identification of these broader industrial areas, from which 261,240 tonnes of capacity (approximately 4.29 hectares) could be delivered, builds flexibility into the plan for the longer term.
- 4.55 The areas have not been identified for a particular type of waste facility. Therefore, although the areas are shown as suitable for waste facilities, proposals will still need to meet all policies within this South London Waste Plan together with any other relevant policies of the appropriate borough's Development Plan.
- 4.56 Therefore, in accordance with PPS10, 2011 London Plan Policy 5.17 and this plan's objectives:

WP4: Industrial Areas with Sites Suitable for Waste Facilities

Planning permissions will be granted for waste facilities on land from within the industrial estates identified in Schedule 2 in order to provide sufficient waste management facilities to meet the Waste Plan's capacity needs, identified in Policy WP1. Planning permissions will also be granted for waste transfer facilities within industrial areas in Schedule 2.

Proposals must satisfy all other policy requirements of this South London Waste Plan. Proposals must also satisfy any other relevant policies within the applicable borough's Development Plan.

WP5: Windfall Sites and Non MSW and C&I Waste Location Criteria

Municipal Solid Waste and Commercial and Industrial Waste

- 4.57 Proposals for waste management development might come forward on sites which are not safeguarded in this plan and are not in the areas identified in Schedule 2. When this occurs, development must be related to need, as identified in Policy WP1, and must be appropriate to the site in question. Proposals for waste transfer facilities on windfall sites may also come forward but they should not be considered against the "need" identified in Policy WP1 (see also paragraph 3.69)
- 4.58 Planning Policy Statement 10 "Planning for Sustainable Waste Management" (Annex E) and 2011 London Plan Policy 5.17 identify a wide range of factors which need consideration when locating waste facilities. Together, these factors aim to deliver the key planning objectives of PPS10 (para 3) which require planning authorities to deliver a strategy which helps secure the recovery or disposal of waste without endangering human health, without harming the environment and which protect green belts, but recognises the particular locational needs of some types of waste management facilities. The requirements of PPS10 (Annex E) and Policy 4A.23 of the London Plan were used in the site evaluation for this document and also form the basis of assessing the suitability of windfall sites.
- 4.59 An objective site selection process was carried out to identify the areas in Schedule 2 and these areas are considered to contain sites which are the most suitable for the development of new/enhanced waste facilities. The partner boroughs of the South London Waste Plan are seeking development on these sites before other sites are considered. Policy WP5 therefore requires developers to consider if the sites and areas identified in Policies WP3 and WP4 are available and achievable before proposing windfall sites.

Other Wastes

4.60 Policy WP2 states that planning permission for additional facilities for other waste streams, including Construction, Demolition and Excavation Waste, Hazardous Waste, Agricultural Waste, Clinical Waste, Radioactive Waste and Waste Water, will be permitted provided there is an identified need and the proposal meets the other policies of the South London Waste Plan. The suitability of proposed sites for the management of other wastes will be judged against the same policy criteria as MSW and C&I windfall sites.

4.61 Therefore, in accordance with PPS10, 2011 London Plan Policy 5.17 and this plan's objectives:

WP5: Windfall Sites and Non MSW and C&I Waste Location Criteria

Proposals for waste facilities on windfall sites will be considered and planning permission granted, provided the proposed development meets all of the following criteria:

- (a) It can be demonstrated that the proposed facility is not deliverable on one of the sites safeguarded in Policy WP3 or in one of the areas identified in Policy WP4;
- (b) In the case of waste management facilities, it can be demonstrated that there is a need for the development either in accordance with Policy WP1 for Municipal Solid Waste and Commercial and Industrial Waste or on a case-by-case basis for those wastes identified in Policy WP2;
- (c) The other policies of the relevant borough's Development Plan are met; and,
- (d) The following locational criteria are met:
 - (i) The site is not within or will not have an adverse effect on nature conservation areas protected by international or national regulations;
 - (ii) The site does not contain features or have an adverse effect on features identified as being of international or national historic importance; and,

(iii) The site has no adverse effect on on-site or off-site flood risk, meets the Sequential Test for flood risk as set out in Planning Policy Statement 25 "Development and Flood Risk" and, where appropriate, the criteria for the PPS25 Exception Test. Proposals involving hazardous waste will not be permitted with Flood Zones 3a or 3b.

Particular regard will be given to sites which:

- are designated by the Waste Plan area's local authorities as suitable for industrial development in the planning policy documents or within extensive areas of despoiled, contaminated, previously developed or derelict land or areas with a history of a waste-related use other than restored landfill or to be restored landfill;
- do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);
- are located more than 100 metres from open space;
- are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
- have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
- have direct access to the strategic road network;
- have no Public Rights of Way crossing the site;
- do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
- offer opportunities to accommodate various related facilities on a single site.

Appropriate mitigation measures will also be considered in assessing site suitability.

Detailed Waste Policies

WP6: Sustainable Design and Construction of Waste Facilities

- 4.62 "Designing Waste Facilities - A Guide to Modern Design in Waste" (DEFRA and CABE⁸, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" 2011 London Plan Policy 5.3 provides guidance on how to deal with the two aspects of climate change.
- 4.63 In terms of standards, the Building Research Establishment (BRE) has established a range of BREEAM⁹ schemes for rating the overall environmental performance of different types of non-residential buildings. Buildings are rated on a scale of 'Pass,' 'Good,' 'Very Good,' 'Excellent' or 'Outstanding.' However, there is no specific BREEAM scheme for waste facilities since there are many different technologies and building types. However, BRE advice is that it will be for developers to liaise with the BRE and BRE-accredited assessors in order to identify a suitable 'bespoke' BREEAM scheme to suit the particular characteristics of the proposed development. It is considered by the boroughs that many waste facilities should be able to meet the 'Excellent' standard. However, if the facility is in a remote location or has high energy requirements for processing, it may only be able to achieve a lower rating. Similar standards should apply if the BREEAM is replaced by another environmental performance rating regime.
- 4.64 While the reduction of carbon emissions is a key element of a BREEAM scheme, the 2011 London Plan sets out specific carbon emission reduction targets that developments should meet:

Table 4.6: Carbon Emission Targets for Non-Domestic Buildings from Policy 5.2 of the 2011 London Plan

Year	Improvement on 2010 Building Regulations
2010-13	25 per cent
2013-16	40 per cent
2016-19	As per building regulations requirements
2019-31	Zero carbon

- 4.65 Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities - A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:
- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities (e.g. for composting facilities) will become particularly vulnerable to odour issues.
 - **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and allowing for the minimisation of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly. Storage and unoccupied areas may be better placed in the warmest areas of the facility.
 - **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include

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9 Building Research Establishment Environmental Assessment Method (see bream.org)

Sustainable Drainage Systems (SUDS), green roofs and walls, soakaways and permeable pavements and parking areas. In addition, facilities should incorporate improvements to flood risk management in support of the objectives of the Catchment Flood Management Plan (CFMP) and the partner boroughs' Strategic Flood Risk Assessments (SFRAs).

- **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.

- **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.

4.66 Developers should therefore have regard to the 2011 London Plan, DEFRA's "Designing Waste Facilities - A Guide to Modern Design in Waste" (2008), the Mayor of London's "Sustainable Design and Construction" SPG (2006) and other Local Development Framework guidance.

4.67 In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.

4.68 Therefore in accordance with national and regional advice, 2011 London Plan Policies 5.2 and 5.3 and this plan's objectives:

WP6: Sustainable Construction of Waste Facilities

All proposals must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with each of the 'essential' standards set out in the Mayor of London's Sustainable Design and Construction SPG (or equivalent) together with all other policies within the South London Waste Plan and any other relevant policies of the appropriate borough's Development Plan.

Waste facilities will be required to:

(a) minimise on-site carbon dioxide emissions in accordance with the standards set out in Table 4.6;

(b) be fully adapted and resilient to the future impacts of climate change, particularly with regard to increased flood risk (including ensuring development is safe, does not increase flood risk elsewhere and where possible, reduces flood risk overall), urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;

(c) incorporate green roofs, sustainable urban drainage systems (SUDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in support of the objectives of the All London Green Grid;

(d) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;

(e) minimise waste and promote sustainable management of construction wastes onsite; and,

(f) protect, manage and enhance local habitats and biodiversity.

WP7: Protecting and Enhancing Amenity

4.69 Planning Policy Statement 10 "Planning for Sustainable Waste Management" states that, "in considering planning applications for waste management facilities, waste planning authorities should consider the likely impact on the local environment and on amenity. These can also be concerns of the pollution control authorities and there should be consistency between consents issued under the planning pollution control regimes."¹⁰ Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.

4.70 Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.

4.71 Developers are advised to pay particular attention to how the design of a facility can mitigate amenity issues. For instance, waste activities impacting on local amenity should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments. "Rubbish In - Resources Out: Design Ideas for Waste Facilities in London" (GLA, 2008) and "Designing Waste Facilities: A Guide to Modern Design in Waste (DEFRA/CABE, 2008) provide useful guidance.

4.72 Therefore, in accordance with PPS10 and this plan's objectives:

WP7: Protecting and Enhancing Amenity

Developments for waste facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.

A waste facility should be within a fully enclosed covered building.

Particular regard will be paid to the impact of the development in terms of:

- (a) The Green Belt, Metropolitan Open Land, recreation land or similar;
- (b) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
- (c) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
- (d) Groundwater, surface water and watercourses;
- (e) Air emissions arising from the plant and traffic generated;
- (f) Noise and vibration from the plant and traffic generated;
- (g) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network;
- (h) Odour, litter, vermin and birds; and,
- (i) The design of the waste facility, particularly:
 - complementing or improving the character of an area;
 - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
 - being of a scale, massing or height appropriate to the townscape or landscape;
 - using good quality materials;
 - minimising the requirement for exterior lighting; and,
 - utilising high-quality boundary treatments.

The information in Schedule 3 will provide the basis for the assessment of the impact of a development.

Schedule 3: Information which may be Required for a Planning Application

No	Information which may be required	No	Information which may be required
1	Type(s) of waste to be managed at the site	22	Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it. The AQ impact assessment should be carried out in accordance with "London Councils - Air Quality and Planning Guidance" and the significance of the AQ impact should be assessed using the methodology in that document
2	Estimated annual throughput of waste materials and timescale of operations	23	An assessment which identifies potential nuisances likely to affect nearby receptors arising from odours, dust, smoke and fumes, and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
3	Estimated capacity of the site	24	Noise Impact Assessment
4	Method of working	25	Sustainability Statement
5	Markets to be served	26	TV and Radio Reception Impact Assessment
6	Present use, conditions and ground levels of the site and its surroundings	27	Measures to prevent new or increased risk to aviation from the proposed development
7	Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used	28	Measures for protecting Public Rights of Way
8	Anticipated employment levels and hours of operation	29	Transport Assessment
9	Statement of Community Involvement	30	Travel Plan
10	Preliminary assessment of BREEAM standard, undertaken by a BRE accredited assessor and commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review	31	Route Management Strategy
11	Energy Assessment, including an assessment of energy demand and CO ₂ emissions	32	Access Strategy
12	Assessment of the impact of the proposed development on the built and historic environment	33	Delivery Servicing Plan/Freight Plan
13	Archaeological evaluation	34	Construction Logistics Plan
14	Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments	35	Highway safety measures
15	Tree Survey/Arboricultural Report	36	Design and Access Statement
16	Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.	37	Restoration, after care, after use and long-term management provision
17	Topographical Survey	38	An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
18	Geological Assessment	39	A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are: <ul style="list-style-type: none"> ● The Richmond Park SAC; ● The Wimbledon Common SAC; ● The Mole Gap to Reigate Escarpment SAC; and, ● The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA).
19	Hydrological and hydrogeological assessment		
20	Flood Risk Assessment		
21	Site drainage details		

WP8: Sustainable Energy Recovery

- 4.73 The 2008 Climate Change Act sets a legally binding target to cut UK emissions by 80% by 2050. In seeking to achieve this target, the UK Renewable Energy Strategy (DECC, 2009) sets out a pathway to generating 15% of the UK's energy from renewable sources by 2020 in line with the EU Renewable Energy Directive. The new Feed-In Tariffs introduced in April 2010 and the proposed Renewable Heat Incentive arising from the Energy Act 2008 will provide further incentives for the development of renewable energy generating capacity.
- 4.74 PPS1: "Delivering Sustainable Development" requires development to be planned to limit carbon dioxide emissions and to make good use of opportunities for the decentralised and renewable production of low carbon energy. The Supplement to PPS1: "Planning and Climate Change" (2007) identifies energy generation from waste as one of a number of renewable energy sources which will help to secure progress against the above objectives. In addition to reducing overall carbon dioxide emissions, energy recovery facilities also help to minimise greenhouse gas emissions from landfill sites by reducing the quantity of residual waste for disposal.
- 4.75 The Mayor has set targets to achieve an overall reduction in London's carbon dioxide emissions of 60% below 1990 levels with 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Within this context, the Mayor's draft Climate Change Mitigation and Energy Strategy (October 2010) recognises that one of the main opportunities for increasing renewable energy generation in London is from energy recovery technologies.
- 4.76 Accordingly, Policy 5.17 of the 2011 London Plan supports developments that contribute towards renewable energy generation, in particular the use of technologies that produce a renewable gas, and developments for producing renewable energy from organic/biomass waste. Wherever possible, opportunities should be taken to provide combined heat and power (CHP) and combined cooling heat and power (CCHP).
- 4.77 Policy 5.8 supports and encourages the more widespread use of innovative energy technologies to reduce use of fossil fuels and carbon dioxide emissions. For waste that cannot be recycled or composted (including anaerobic digestion), the Mayor has a preference for advanced conversion waste technologies such as gasification and pyrolysis. This contrasts with advice in Chapter 5, Paragraph 27 of the Waste Strategy for England (DEFRA, 2007) which states: "The Government does not generally think it is appropriate to express a preference for one technology over another since local circumstances differ so much." However it is expected that all proposed technologies recovering energy from non-recyclable waste should achieve at least a positive carbon outcome, whereby the direct emissions from the technology are offset by carbon dioxide emissions savings from the generation and distribution of heat and electricity to users.
- 4.78 Policy 5.5 prioritises the development of decentralised heating and cooling networks, including decentralised energy opportunities through the use of energy recovery technologies. Policy 5.6 requires that where future network opportunities are identified, proposals should be designed to connect to these networks. The Mayor has developed a London Heat Map tool to help boroughs and developers identify decentralised energy opportunities as the basis for developing more detailed local energy masterplans. The London Development Agency's decentralised energy masterplanning support package (DEMaP) will assist the partner boroughs of the South London Waste Plan to identify decentralised energy opportunity areas within the plan area based on the outcome of heat mapping and locally set targets for carbon reduction.

4.79 Although energy recovery facilities are likely to play an important role in the future management of waste arisings across the plan area and as a source of renewable heat and power, it is important to note that recovery is lower in the waste hierarchy than other waste management options. In line with Policy WP1 such proposals will be required to demonstrate that the waste cannot practicably and reasonably be re-used or recycled. This will ensure that the thermal treatment plant does not 'crowd out' the potential for recycling, composting or re-use.

4.80 All boroughs are firmly against poor performing, outdated technologies such as old-fashioned mass-burn incineration which is poorly designed, visually intrusive and releases high levels of noxious emissions. Furthermore, there is the Mayor's requirement that energy recovery facilities should achieve a positive carbon outcome.

4.81 EU Waste Directives¹¹ impose high standards on modern energy recovery facilities to minimise the impact of negative environmental effects on the environment and human health resulting from emissions to air, soil, surface and groundwater.

4.82 Any new energy recovery facilities built within the plan area must meet the requirements of the Directive and the Environment Agency (EA) will only issue a permit if they are satisfied the plant will be designed, built, operated and maintained in such a way that the requirements of the Directive are met and human health and the environment are protected.

4.83 The issuing of a permit marks the first stage of the EA's regulation of an incinerator. The EA then continually assesses the plant operations and its environmental performance. This will include the continuous and periodic monitoring of emissions by the operator, check monitoring by the EA and frequent plant inspections.

4.84 Therefore, in accordance with the London Plan and this plan's objectives:

WP8: Sustainable Energy Recovery

Proposed energy recovery developments, including thermal treatments, will be required to:

- (a) demonstrate that the waste identified for treatment cannot practicably be reused or recycled in accordance with Policy WP1;
- (b) demonstrate that the proposal will achieve a positive carbon outcome and contribute to local targets for reducing carbon emissions;
- (c) deliver renewable heat and power (or heat, power and cooling), for local users where feasible; and,
- (d) minimise potential adverse impacts on human health, local amenity and environment in accordance with Policies WP6 and WP7.

Any proposed thermal treatment facilities must allow for the recovery of renewable heat and power (or heat, power and cooling) and be within a fully enclosed covered building.

¹¹ The principal directive with regard to energy recovery from waste and its effect on the environment is 2000/76/EC. Other directives of note are 89/369/EEC and 89/429/EEC

WP9: Planning Obligations

4.85 Planning Obligations, or Section 106 agreements, are legal agreements negotiated between local authorities and developers or unilateral undertakings made by developers. The use of planning obligations will be in line with the prevailing legislation and guidance and the prevailing policies of the relevant borough.

4.86 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before resorting to a planning obligation. However, there may be situations where the use of planning conditions is not possible. The following are examples of where a planning obligation may be considered:

- Traffic management measures, including the routing of vehicles;
- Access and highway improvements;
- Provision of infrastructure, including low carbon and decentralised energy networks;
- Protection of sites of international, national, regional or local importance;
- Environmental enhancement;
- Flood risk compensation works;
- Archaeological investigation, recording and keeping of artefacts and safeguarding of remains;
- Off-site monitoring of emissions and the water environment; and,
- Provision and management of off-site or advance planting and screening.

WP9: Planning Obligations

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.



Policy Monitoring Framework

POLICY & SLWP Objective	Indicator	SA Indicator SLWP I.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
<p>WPI (Monitoring framework 1) which looks at first part of policy</p> <p>Bullets 2, 3, 6;</p>	<p>Number, site area (ha) and annual capacity of existing and new licensed waste facilities for MSW and C&I waste</p>	<p>I.1</p> <p>To maximise net self-sufficiency in the management of all waste arisings within South London</p>	<p>By 2016 (PFC16)</p> <ul style="list-style-type: none"> ● 834,011 tonnes in total, of which 321,328 tonnes = MSW 512,683 tonnes = C&I (London Plan 2011 apportionment) ● 1,004,350 tonnes in total, of which 453,891 tonnes = MSW 550,458 tonnes = C&I (London Plan 2011 arisings) <p>By 2021</p> <ul style="list-style-type: none"> ● 941,024 tonnes in total (London Plan 2011 apportionment) of which 382,543 tonnes = MSW 558,481 tonnes = C&I) ● 1,017,427 tonnes in total (London Plan 2011 arisings) of which 468,986 tonnes = MSW 548,441 tonnes = C&I) 	<p>GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry</p>	<p>Monitor annually against target - partner borough monitoring spreadsheet fed by the data from the partner borough application protocol. Assess target annually, act on rolling three year phase, considering unmet target and relevant waste management capacity in the planning pipeline</p>	<p>Contingencies: if target not being delivered and not enough capacity in planning pipeline, explore reasons for failure: contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas (to facilitate comparison)</p>	<p>Identify reasons for failing target and address as follows:</p> <ul style="list-style-type: none"> ● Schedule 1 sites not coming forward ● Contact landowners/ developers of Schedule 1 sites to ensure sites are coming forward (this feeds into the trajectory updates). ● If stalled, identify reason for stalling and borough(s) to act as a facilitator for development ● Planning applications not coming forward for facilities in Schedule 2 areas ● Hold periodic meetings with waste operators to ensure we have their views of needs and site ● Vacancy rates high in SILs and LSILs but planning applications not coming forward ● Monitor vacancy rates in SILs and LSILs (already monitored by boroughs) and send information to waste operators ● Sites not available ● Meet major landowners to assess potential ● Identify scope for borough(s) to act as a facilitator for land assembly

POLICY & SLWP Objective	Indicator	SA Indicator SLWP 1.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
<p>WPI (Monitoring framework 1) which looks at first part of policy (continued)</p> <p>Bullets 2, 3, 6;</p>							<ul style="list-style-type: none"> • Assess the market churn to identify any level of churn and, if high, why waste operators are shut out • Discuss public sector land availability with borough(s) estate departments • Sites available but planning applications not coming forward • Establish a "waste plan forum" to bring together landowners and developers to discuss needs and way forward • Identify whether this is a South London problem or a wider problem by raising issue through London RTAB and share delivery experience through the London RTAB • Consult and co-ordinate with the GLA. Also work jointly with the GLA on facilitating delivery • Involve the London Waste and Recycling Board as a possible funding partner • Planning applications being refused • Consider producing an SPD or revising the DPD

POLICY & SLWP Objective	Indicator	SA Indicator SLWP 1.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
<p>WPI (Monitoring Framework 2&3) which looks at "waste hierarchy" part of policy</p> <p>Bullets 1,2,6</p>	<p>Proportion of MSW and C&I arisings that are recycled.</p> <p>Proportion of MSW and C&I arisings that are composted</p>	<p>1.3 & 1.4 to promote waste management in accordance with the waste hierarchy in order to maximise landfill diversion.</p>	<p>By 2016 proportion arisings recycled or composted MSW = 50% C&I=70%</p> <p>By 2021 proportion arisings recycled or composted MSW=50% C&I=70%</p>	<p>GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry</p>	<p>Assess target annually, actions on a rolling three year basis. Applicants to demonstrate positive carbon outcome of their facility having regard to the waste hierarchy (PPS10) using the VWRATE model (Environment Agency) until it is replaced by the GLA model</p>	<p>Contingencies: if target not being delivered and not enough capacity in planning pipeline, explore reasons for failure; contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas and south east (to facilitate comparison)</p>	<p>Depending on reasons for failing target - as above</p>
<p>WPI</p> <p>Bullets 1,2,6</p>	<p>Proportion of MSW and C&I arisings that are managed under 'other recovery' in the waste hierarchy</p>	<p>1.3 & 1.4 to promote waste management in accordance with the waste hierarchy in order to maximise landfill diversion.</p>					
<p>WP2</p> <p>Bullets 1,2,6</p>	<p>(a) Amount of CD&E waste landfilled annually</p>	<p>1.4 to promote waste recycling or composting in accordance with the waste hierarchy in order to maximise landfill diversion</p>	<p>That 5% or less of the London Plan arisings of CD&E waste attributed to the four boroughs in the SLWP area is landfilled.</p>	<p>GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry</p>	<p>Assess target annually, actions on a rolling three year basis.</p>	<p>If % of CD&E arisings sent to landfill is greater than 5% over a 3 year period and there is not capacity in the pipeline to manage this waste, then contact waste management industry to explore reasons and take management actions. Also comparison with surrounding areas and source of landfilled CD&E if possible</p>	<p>Depending on reasons for failing target. Consider working with EA, GLA and developers (e.g. housebuilders etc) to explore barriers and encourage greater onsite recycling.</p>

POLICY & SLWP Objective	Indicator	SA Indicator SLWP 1.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
<p>WP3</p> <p>Bullets 3,6</p>	<p>Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of Schedule 1 sites</p>	<p>1.2 to provide sufficient sites and waste management facilities in suitable locations to deal with all waste streams making up South London's future apportionment</p>	<p>Number, site areas (ha) and capacity (tonnes, throughput, facility type) of Schedule 1 sites not to decrease unless compensatory capacity (tonnes, throughput, facility type) is provided elsewhere through facilities in line with other SLWP policies.</p>	<p>GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry.</p>	<p>Assess target annually, actions on a rolling three year basis.</p>	<p>If target not met on rolling three year basis and no recovery in planning pipeline, explore reasons for failure through contact with waste management industry, comparison of capacity with surrounding areas, further Schedule 1 site assessments etc to inform management actions</p>	<p>As first row plus could explore greater deliverability on Schedule 2 sites.</p>
<p>WP4</p> <p>Bullets 3,6</p>	<p>Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of new licensed waste facilities on Schedule 2 sites</p>	<p>1.2 to provide sufficient sites and waste management facilities in suitable locations to deal with all waste streams making up South London's future apportionment</p>	<p>Additional waste management capacity (tonnes) to meet apportionment and strive to meet arisings (Target (capacity gap) in 2011 = up to 261,240 tonnes, - approximately 4.29 hectares of land)</p>	<p>GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry.</p>	<p>Assess target annually, actions on a rolling three year basis.</p>	<p>If target not met on rolling three year basis and no recovery in planning pipeline, explore reasons for failure through contact with waste management industry, comparison of capacity with surrounding areas, further Schedule 1 site assessments etc to inform management actions</p>	<p>As first row plus could explore greater deliverability on Schedule 1 sites</p>
<p>WP5(a)</p> <p>Bullets 3,6</p>	<p>Number, site area (ha) and annual capacity (tonnes, waste stream throughput) of waste management facilities approved under WP5</p>		<p>(a) Reasons for Schedule 1 and 2 sites not being considered deliverable (suitable, available and achievable) to provide additional waste management capacity.</p>		<p>Monitor annually, assess performance on a three-year rolling basis</p>	<p>If more sites are being delivered through Policy WP5 because Schedule 1 and 2 sites are not being assessed as deliverable (i.e. suitable, available and achievable) then investigation of the reasons that Schedule 1 and 2 sites are not deliverable, and appropriate management actions to be taken</p>	<p>As first row plus longer term action could be to designate new sites through DPD revision.</p>

POLICY & SLWP Objective	Indicator	SA Indicator SLWP I.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
WP5(b&c) Bullets 3,6	See WPI and other						
WP5(d)(i) Bullets 4,6	Number, area and condition of internationally, and nationally designated nature conservation sites (SSSIs, SPAs, SACs)	8.1 to ensure that waste management sites and associated activities have no adverse impacts on internationally and nationally designated nature conservation sites	0. (That no planning permissions for new waste management facilities on windfall sites are granted where the environmental assessment of the site demonstrates an adverse effect on internationally or nationally regulated nature conservation areas.)	Waste management industry, GLA, partner boroughs, Environment Agency, GIGL, Natural England	Monitor per application using Habitat Regs Assessment, Biodiversity Assessments, GIGL data, quality assessments of SSSIs etc	Contingencies: none - no permissions should be granted contrary to this element of the policy.	Management actions: not applicable
WP5(d)(ii) Bullets 4,6	Number, area and condition of internationally, and nationally designated sites of historic importance	9.2 to conserve and enhance the quality of South London's built and historic environment	0. (That no planning permissions for new waste management facilities on windfall sites are granted where the site assessment demonstrates an adverse effect on internationally or nationally regulated sites of historic importance)	Waste management industry, GLA, partner boroughs, English Heritage	Monitor per application using design and access statement, etc	Contingencies: none - no permissions should be granted contrary to this element of the policy.	Management actions: not applicable.
WP5(d)(iii) Bullets 4,6	Number, area and capacity of permissions granted for sites under Policy WP5 contrary to Environment Agency advice on flooding	5.1 to avoid, reduce and manage flood risk affecting or arising from waste related developments	0. (That no planning permissions for new waste management facilities on windfall sites are granted contrary to Environment Agency advice (PPS25 sequential test, impact assessments etc)	Environment Agency, waste management developers, partner boroughs	Monitor per application flood risk assessments and partner boroughs SFRAs and SWMPs	Contingencies: none - no permissions should be granted contrary to this element of the policy.	Management actions: not applicable

POLICY & SLWP Objective	Indicator	SA Indicator SLWP 1.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
WP5 bullet points Bullets 4,6	Number, area and capacity of sites that achieve positive results for all of the issues raised under the bullet points (precise monitoring details in WP7)	See indicators for WP7 below	100% positive result for each indicator (see targets for WP7 below)	See delivery partners for WP7 below			
WP6 Bullets 2,6	Number of permissions granted for waste management facilities: • qualifying for bespoke BREEAM excellent • complying with each of the essential standards in the Mayor's Sustainable Design and Construction SPG	4.4 to promote the highest standards of sustainable design and construction	100% of waste management developments to qualify for bespoke BREEAM excellent and comply with each of the essential standards in the Mayor's Sustainable Design and Construction SPD	Waste management industry, GLA, partner boroughs, Environment Agency, BRE	Monitor annually, actions on rolling 3 year basis	Contingencies if performance does not fall within acceptable ranges - more than 20% of permissions granted over rolling three years fail to meet BREEAM excellent (bespoke) and the Mayor's SPD standards where these are feasible.	Management actions: investigate with BRE / GLA why BREEAM excellent bespoke / Mayor SPD not being met provide specific advice (e.g. workshops from BRE) to support measures.
WP6(a) Bullets 2,6	Number of permissions granted which minimise carbon emissions in accordance with Table 4.6		By 2013: 25% improvement on building regs compared to 2010 carbon emissions By 2016: 40% improvement on building regs compared to 2010 carbon emissions By 2019: as per building regs requirements By 2031: - zero carbon	Waste management industry, GLA, partner boroughs, Environment Agency, BRE	Monitor by development, towards targets in Table 4.6, use BREEAM assessment (BRE 2011 allows comparison between London Plan carbon targets and BREEAM	Contingencies: BREEAM excellent is bespoke so contingencies can be built into the assessment with BRE.	Management actions: if developments regularly not meeting BREEAM excellent bespoke, explore with BRE the reasons why, consider refusing permission or adapting scheme.
WP6(b)	(monitored under same criteria as WP7)						

POLICY & SLWP Objective	Indicator	SA Indicator SLWP I.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
WP6(c) Bullets 2.6	Number of permissions incorporating SUDS, green roofs, rainwater harvesting	4.4 to promote the highest standards of sustainable design and construction	100% of waste management developments to incorporate SUDS and appropriate climate change adaptation measures where possible	Waste management industry, GLA, partner boroughs, Environment Agency	Monitor annually, actions on rolling 3 year basis	Contingencies if performance does not fall within acceptable ranges - more than 20% of permissions granted over rolling three years fail to incorporate climate change adaptation measures where these are feasible	Management actions: investigate which climate change adaptation measures not being met, and reasons; provide specific advice (e.g. workshops, SPD) to encourage measures
WP7 Bullets 2,4,6	Number of delivered waste management facilities within a fully enclosed covered building	6.1 to improve local quality of environment and limit pollution as much as possible to minimise impacts on the environment and human health.	100% of waste management developments to be within a fully enclosed, covered facility.	Waste management industry	Monitoring annually	Contingencies if any waste management development is granted permission where the management aspects of any waste management development (e.g. MRF, not storage of materials) is not enclosed	Explore reasons for decision and ensure that no treatment element of waste management facilities is not within an enclosed building.
WP7(a) Bullets 4, 6	Number of facilities with no or a positive impact on Green Belt or MOL	7.1 to safeguard permanence and integrity of Green Belt and MOL	100% of waste management developments to have no or a positive impact on Green Belt / MOL	Waste management industry, GLA, partner boroughs, Environment Agency	Monitor annually, actions on rolling 3 year basis (design and access statement)	Contingencies: explore reasons for failure within specific planning decisions.	Management actions: provide more detailed assessment (e.g. via SPD) Schedule 1 and 2 sites in relation to open characteristics of Green Belt / MOL
WP7(b) Bullets 4,6	Number of facilities which do not harm biodiversity especially on internationally	8.1 to ensure that waste management sites and associated activities have no adverse impacts	0. (That no planning permissions for new waste management facilities are granted where the environmental assessment of the site	Waste management industry, GLA, partner boroughs,	Monitored annually Biodiversity Assessment for applicants, comparison	Contingencies: explore reasons for failure within specific planning decisions.	Management actions: provide more detailed assessment (e.g. via SPD) of biodiversity

POLICY & SLWP Objective	Indicator	SA Indicator SLWP I.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies	Management actions
WP7(b) <i>(continued)</i> Bullets 4,6	or nationally protected nature conservation areas (SSSIs, SAC, SPA, SINC etc)	on internationally and nationally designated nature conservation sites	demonstrates an adverse effect on internationally or nationally regulated nature conservation areas.)	Environment Agency, GIGL, Natural England	with GIGL data, quality assessments of SSSIs etc		characteristics of Schedules 1 and 2 sites
WP7(c) Bullets 4,6	Number of facilities which do not harm archaeological sites, the historic environment and sensitive receptors	1.11 Protecting and enhancing the quality of the local environment for residents living near waste management facilities	0	Waste management industry, GLA, partner boroughs, Environment Agency, English Heritage	Monitor annually, actions on rolling 3 year basis (design and access statement)	Contingencies: explore reasons for failure within specific planning decisions.	Management actions: provide more detailed assessment (e.g. via SPD) of characteristics of Schedules 1 and 2 sites
WP7(d) Bullets 4,6	Number of facilities which do not harm groundwater surface water and watercourses	6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health	0	Waste management industry, GLA, partner boroughs, Environment Agency	Monitor annually, actions on rolling 3 year basis (flood risk assessments in comparison with partner boroughs SFRAs and SWMPs)	Contingencies: explore reasons for failure within specific planning decisions.	Management actions: improve design guidance to minimise flood risk, co-ordinate enforcement action for breaches with EA and partner boroughs.
WP7(e) Bullets 4,6	Pollution incidents associated with waste developments by pollutant, severity, duration and facility type	6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on the environment and human health	0	Waste management industry, GLA, partner boroughs, Environment Agency	Monitor annually, actions on rolling 3 year basis (air quality assessments in comparison with partner boroughs especially Air Quality Management Areas). Also enforcement complaints and actions from active facilities	Contingencies: explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	Management actions: improve design guidance to minimise air pollution, co-ordinate enforcement action for breaches with EA and partner boroughs.

POLICY & SLWP Objective	Indicator	SA Indicator SLWP 1.13 Appendix 3	Target & Source	Delivery Partners	Monitoring against delivery	Contingencies actions	Management
WP7(f) Bullets 4,6	Number of facilities which do not demonstrate minimal impact from noise	6.2 to minimise the impact of noise and vibration from existing or new waste facilities and related activities	0	Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	Monitor annually, actions on rolling 3-year basis (noise impact assessment). Also EA and borough enforcement of active waste management facilities. Also comparison with DEFRA's Road Traffic Noise Map.	Contingencies: explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	Management actions: improve design guidance to minimise noise, co-ordinate enforcement action for breaches with EA and partner boroughs.
WP7(g) Bullets 4,6	Number of facilities which do not demonstrate minimal impact from traffic (noise, air pollution)	6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on environment and human health	0	Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	Monitor annually: Travel plan, transport assessments, route management strategy, access strategy, delivery servicing / freight plan. Also enforcement complaints and actions from active facilities.	Contingencies: explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	Management actions: improve design guidance to minimise vehicle movements and their impacts, co-ordinate enforcement action for breaches with EA and partner boroughs.
WP7(h) Bullets 4,6	Number of facilities which demonstrate no impact from odour, litter, vermin and birds	6.1 to improve local environmental quality and limit pollution as much as possible to minimise impacts on environment and human health	100%	Waste management industry, GLA, partner boroughs, Environment Agency, DEFRA	Monitor annually, including enforcement actions on active facilities: landscape assessments, odour assessments	Contingencies: explore reasons for failure within specific planning decisions and if pattern to any enforcement actions of active facilities to inform management actions.	Management actions: improve design guidance to minimise impacts and co-ordinate enforcement action for breaches with EA and partner boroughs.
WP8 Bullets 2,4,6	Number of developments granted for energy from waste facilities that demonstrate a positive carbon outcome	1.3 & 1.4 to promote waste management in accordance with the waste hierarchy in order to maximise landfill diversion.	100%	GLA, Environment Agency, SLWP partner boroughs (data sources); waste management industry, BRE	Assess target annually, actions on a rolling three year basis. Applicants to demonstrate positive carbon outcome of their facility having regard to the waste hierarchy (PPS10) using the WRATE model (Environment Agency) until it is replaced by the GLA model	Contingencies: if target not being delivered and not enough capacity in planning pipeline, explore reasons for failure: contact waste management industry especially south London operators to explore reasons for lack of deliverability; also other outer London waste plan areas and south east (to facilitate comparison)	Depending on reasons for failing target.

Section 5: Site Descriptions

Guide to the site and area descriptions

The following pages set out details of:

- The existing waste management and waste transfer sites identified in Schedule 1. Those which are likely to be intensified or redeveloped as waste management facilities during the period 2011-2016 have site maps and descriptions, while those sites where redevelopment is unlikely have site maps only;
- The industrial areas with sites which may be suitable for additional waste management facilities, as identified in Schedule 2.

Proposals Map Designations:

These set out the designations covering the site on the relevant borough's Proposals Map. They are correct as of September 2010 but may be amended as boroughs update their Development Plan. Please note that the maps accompanying the site details are at different scales.

Constraints:

These are the principal constraints identified in the site selection process. It is not an exhaustive list of constraints and but provides an indicative guide.

Comments from Previous Consultations:

These are the principal issues raised in relation to the site at either the Preferred Options consultation (July-October 2009) or the Additional Sites consultation (February- March 2010). The table shows how the issues raised have been addressed.

Key Issues to Consider:

This section sets out the key issues that developers should consider when putting forward a waste management scheme for the site. The guide does not constitute a comprehensive list of criteria for development and all schemes will need to comply with the Development Plan policies of the relevant borough.



Existing Waste Sites Listed in Schedule I

Sites Likely to be Redeveloped within the Period 2011-2016		
Ref No	Site Name	Borough
1	Factory Lane Transfer Station, Factory Lane	Croydon
6	Villiers Road HWRC, Chapel Mill Road	Kingston
9	Garth Road HWRC, Garth Road	Merton
17	Country Waste Recycling Ltd, Beddington Lane	Sutton
18	Viridor Recycling and Composting Centre, Beddington Lane	Sutton
27	SITA Transfer Station, Weir Road	Merton
126	Benedict Wharf Transfer Station (also a MRF on-site)	Merton

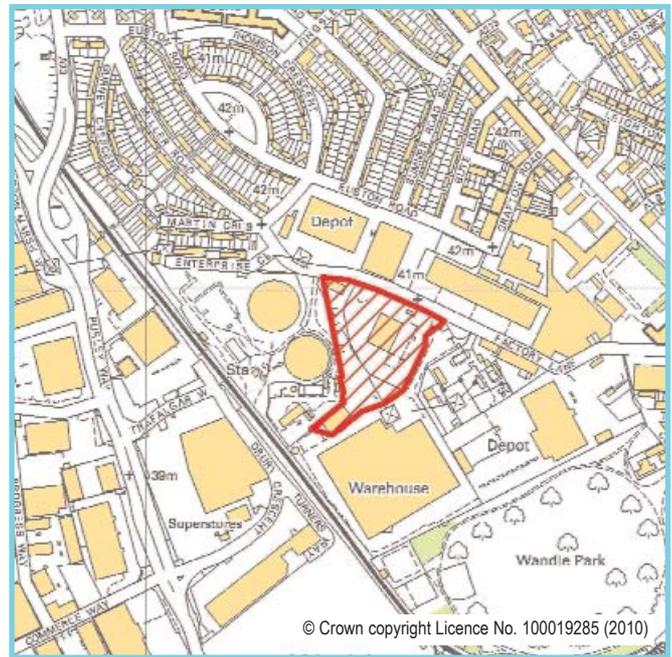
Other Safeguarded Sites in Schedule I		
Ref No	Site Name	Borough
2	Fishers Farm HWRC, North Downs Road	Croydon
3	Kimpton Road HWRC, Kimpton Park Way	Sutton
4	Purley Oaks HWRC, Brighton Road	Croydon
5	Pear Tree Farm WTS, Featherbed Lane	Croydon
19	SE Skips/Waste World Ltd, Willow Lane	Merton
21	777 Recycling Centre, Coomber Way	Sutton
22	B Nebbett & Son, Ellis Road	Merton
23	Five Star Japanese Auto Spares, Unit 1-2 Weir Road	Merton
25	Sloane Demolition, Amenity Way	Merton
26	Weir Road HWRC, Weir Road	Merton
97	Sevenside Waste Paper, Beddington Lane	Sutton
98	Croydon Transfer Station, Endeavour Way	Sutton
100	European Metal Recycling, Therapia Lane	Sutton
101	Rentokil Initial Services Ltd, 46 Weir Road	Merton
A	Safety Kleen Ltd, Unit B6, Redlands Coulsdon	Croydon
B	Stubbs Mead Depot, Factory Lane	Croydon
V	Vertal, Willow Lane	Merton
BF	Beddington Farmlands Landfill	Sutton

Site I: Factory Lane Transfer Station, Croydon

Site Description: The site is part of a larger industrial area. At present, the site accommodates a household reuse and recycling centre and waste transfer station. Active gas holders lie to the north-west of the site and power lines are overhead. The Wandle Park lies to the south-east of the site. Access from the site is via Factory Lane to the trunk road network, A235/A236.

Site Area: 1.79ha

Proposals Map Designations: Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, close to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.



Constraints: The site is partly within Flood zone 3b and contains an archaeological site. The site has limited opportunities for the sustainable transport of materials in and out of the site.

Opportunities: The site is an established industrial area, with established waste use.

Objections from Previous Consultations:

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph I particularly
Nearby residential area	Policy WP7 strengthened, see paragraph I particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the nearby Wandle Park;
- Minimising flood risk on- and off-site;
- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Evaluating and preserving any archaeological remains;
- Any development of this site must consider its siting within the Croydon Panorama arc;

Site 1: Factory Lane Transfer Station, Croydon (continued)

- Remediating the site of historical contamination
- The following protected species that have been sited on or within the vicinity of the site within the last five years: West European Hedgehog, Stag Beetle and House Sparrow.

Delivery: This site is owner occupied by Croydon Borough Council and is in use as a waste site. Together with Site 9 (Garth Road Civic Amenity Site) and Site 6 (Villiers Road), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

Site 6: Villiers Road HWRC, Kingston

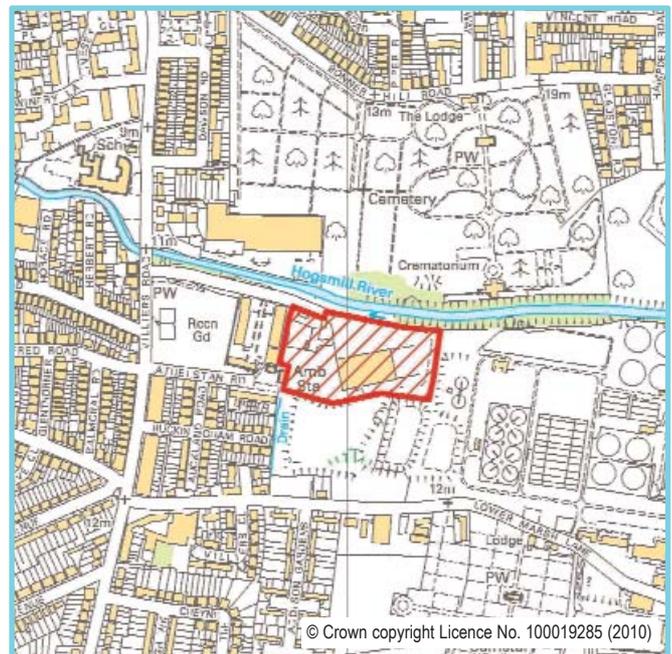
Site Description: The site is the borough's existing waste transfer station and household waste and recycling centre. Existing buildings include a 20-25m high shed with 2-storey light industrial units to the west. Thames Water's sewage treatment works lies to the east and the site is bordered by the River Hogsmill and the cemetery to the North.

Site Area: 2.02ha

Proposals Map Designations: Formerly Proposals Site 26 and currently designated as a site of archaeological importance. (Kingston Unitary Development Plan, 2005 as amended in 2008).

Site Constraints: No access to the strategic road network. Access is therefore from the A2043 Cambridge Road, then via the local distributor residential roads: Hawkes Road, then Villiers Road. Key junctions of concern are Villiers Road/Hawkes Road and Cambridge Road/Hawkes Road, both of which are running at capacity at peak hours with limited opportunity for improvement due to narrow footways and close proximity of buildings. The site is in close proximity to a local nature conservation area to the north and south and affords no opportunities for sustainable transport. Part of the site is also at risk of flooding.

Site Opportunities: The site is in existing waste use and over 100m from the nearest houses (to the southwest of the site). The site is partially screened in the south-west corner and well screened around the rest of the perimeter by Kingston cemetery to the north, Thames Water land to the east and a local nature conservation area to the south. The site falls within the Hogsmill Masterplan area and therefore development must consider the implications of this. It should be noted that the Hogsmill area has been identified as potentially suitable for the production of heat and power as part of a decentralised energy network. The Hogsmill River runs adjacent to the site giving potential for enhancement works to this feature. The river is currently in a heavily engineered state in this area and improvements to the buffer zone could be incorporated to improve the river corridor.



Objections from Previous Consultations:

Issue Raised	Action Taken
Traffic impact and safety concerns	Policy WP7 strengthened, see point (g) particularly
Proximity to residents and local schools	Policy WP7 strengthened, see point (c) particularly
Water pollution to the Hogsmill River	Policy WP7 strengthened, see points (e) and (f) particularly
Loss of residential amenity	Policy WP7 strengthened, see paragraph I particularly

Site 6: Villiers Road HWRC, (continued)

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties in the vicinity of the site, especially those in close proximity to the SW and in particular with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Opportunities to improve the access to the site should be investigated. Traffic impact on surrounding residential roads must be minimised and increased traffic must be avoided.
- Taking measures to maintain the existing nature conservation value of the site, with particular attention to the Hogsmill River;
- Ensuring groundwater and watercourses are not harmed by any development and taking opportunities to improve the River Hogsmill;
- Respecting buffer zones to the Hogsmill River, as advised by the Environment Agency;
- Designing a facility which does not significantly impact on the adjacent Metropolitan Open Land;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species have been sited on the site:
 - In June 2008, Common Starling sightings in Kingston Cemetery noted that they were "gathering food to take to young in waste transfer station and young also feeding on grass".
- The following protected species have been sited off site:
 - To the north of the waste transfer site, lies Kingston Cemetery, a wide variety of birds: House Sparrow, Song Thrush, Hedge Accentor, Common Starling, Herring Gull, Common Kingfisher, Redwing, Sand Martin, Common Linnet, Common Bullfinch, Lesser Redpoll, Northern Lapwing, Eurasian Hobby, Green Sandpiper, Lesser Spotted Woodpecker have been recorded. Bat species, Pipistrellus pipistrellus and Soprano Pipistrelle as well as a Grass Snake and Water Vole were recorded.
 - To the north/northwest of the site, at Bonner Hill Road, various species of bats and birds have been sighted.
 - Knights Park lies to west of site, where a variety of bird species such as the Kingfisher and a variety of bat species: Common Pipistrelle, Daubenton's Bat, Lesser Noctule, Natterer's Bat, Pipistrellus and Soprano Pipistrelle have been spotted.
 - To the east of site, lies the Hogsmill River where various species of birds and a water vole have been recorded.
 - To the south/south east of waste transfer site, lies Berrylands, where Sand Martins have been sighted.
 - A Eurasian Badger was sighted in June 2007 at Bonner Hill Road
- The following protected habitat is located within a 500m radius : Woodland.

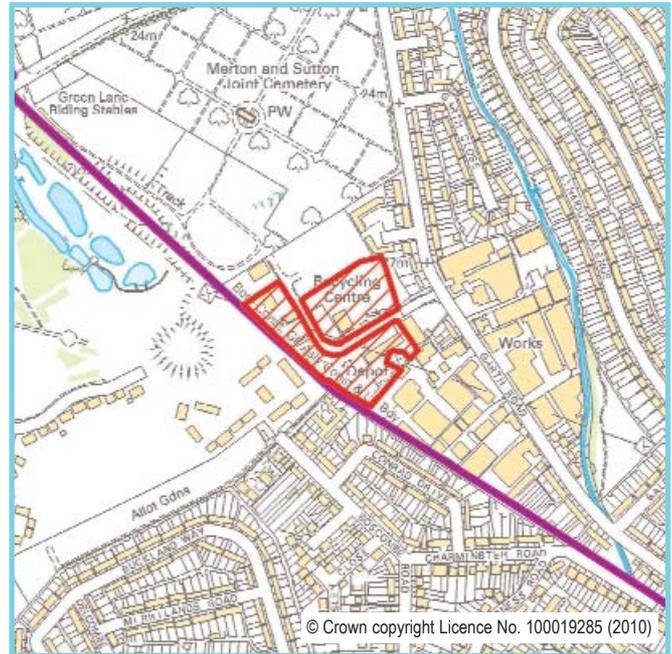
Delivery: This site is owner occupied by Kingston Council and is in use as a waste site. Together with Site 9 (Garth Road Civic Amenity Site) and Site 1 (Factory Lane), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

Site 9: Garth Road HWRC, Merton

Site Description: The site is part of a larger industrial area which Merton Council wholly owns. At present, the site accommodates a household reuse and recycling centre and Merton Council's highways depot with salt storage. To the north of the site, there is a waste transfer site and a plant hire operator, to the east and southwest are houses and to the southeast are industrial units. Along the south-western boundary are a 'Green Corridor' and a SINC. From the A24 to the south of the site, access is gained via Garth Road, which has houses and part of the Garth Road Industrial Estate along it.

Site Area: 2.05ha

Proposals Map Designations: Industrial Area, Special Industrial Zone and a part of the site incorporates Site Proposal I7P proposing a Waste Treatment Facility including a buffer zone and environmental improvements (Merton Adopted Unitary Development Plan, 2003). The London Plan protects the existing waste management facility.



Constraints: No direct access to the Strategic Road Network, limited opportunities for sustainable transport and is adjacent to a locally important Nature Conservation Area.

Opportunities: The site is in single ownership, in an established industrial area and a part is currently being used as a waste management facility.

Objections from Previous Consultations:

Issue Raised	Action Taken
Pollution	Policy WP7 strengthened, see paragraph I particularly
Nearby residential area	Policy WP7 strengthened, see paragraph I particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;

Site 9: Garth Road HWRC, Merton (continued)

- Developing a facility which could make heat and/or power available to local users
- Discussion with the local authority regarding the potential relocation of the household waste and recycling centre, should this be displaced and should the facility need replacing;
- Remediating the site of historical contamination
- The following protected habitats are located within a 500m radius: Standing Water and Lowland Meadow
- The following protected species have been sighted within the vicinity of the site:
 - To the north east of the site at Mayflower Park, the following have been recorded: Common starling, Hedge Accentor, Herring Gull, Lesser Noctule, Pipistrellus Pipistrellus, Soprano Pipistrelle and Daubenton's Bat.
 - To the north east of the site at Joseph Hood Recreation Ground, a Lesser Noctule, Pipistrellus and Song Thrushes have been sighted.
 - To the south west of the site, at postcode KT4 8N: frogs, toads and starlings have been sighted.
 - In 2007, in Mayflower Park, the comment on Eurasian Badgers states "may be foraging near the raised viewpoint area. There are no badgers on site."

Delivery: This site is owner occupied by Merton Borough Council and is in use as a waste site. Together with Site 1 (Factory Lane) and Site 6 (Villiers Road), the South London Waste Partnership has offered this site to potential operators as part of their ongoing work to procure a contract to treat the partner boroughs' residual municipal waste. There is potential for one or more of these transfer stations to be developed during the Plan period 2011-2016.

Site 17: Country Waste Recycling Ltd, Sutton

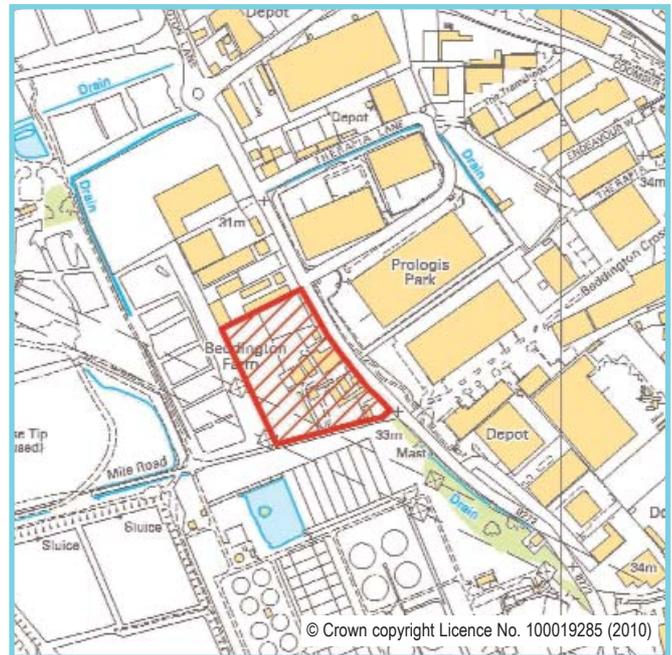
Site Description: The site is located within a Strategic Industrial Area with sewage works infrastructure to the west, industrial uses to the north and east and open land to the south. The south western portion of the site is crossed by overhead electricity cables. The site is currently used as an open air waste transfer station with recovery activities and is unsatisfactory within the context of modern waste management practices. Access is from Beddington Lane and Mile Road.

Site Area: 2.38ha

Proposals Map Designations: Site of Importance for Nature Conservation, Strategic Industrial Area, Archaeological Priority Area

Constraints: Non-direct access to the Strategic Road Network, partly a nature conservation area, limited opportunities for utilising sustainable transport modes and a locally protected view.

Opportunities: Site already accommodates waste management uses but needs modernisation and the routing to the site should be primarily through an industrial area



Objections from Previous Consultations:

Issue Raised	Action Taken
The current site has a severe amenity impact	Policy WP7 strengthened, see paragraph 2 particularly
The traffic impact is severe	Policy WP7 strengthened, see point (g) particularly
The site is not enclosed	Policy WP7 strengthened, see paragraph 2 particularly
The site is near a school	Policy WP7 strengthened, see point (c) particularly

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing facilities on site;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Ensuring that traffic to and from the site is routed to avoid sensitive receptors and residential properties as far as possible and the volume of traffic is not unduly increased;

Site 17: Country Waste Recycling Ltd, Sutton (continued)

- Taking measures to maintain the existing nature conservation value of the site and providing offsite mitigation measures if this is not possible;
- Ensuring groundwater and watercourses are not harmed by any development;
- Designing a facility which does not severely impact on the openness of Beddington Farmlands;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following species have been sited on or in the vicinity of the site: Stag Beetle, Eurasian Tree Sparrow, Common Starling, Common Frog, House Sparrow, Cornflower, Caraway
- The following protected habitats are located within a 500m radius: Standing Water and Woodland

Delivery: The operator has previously submitted an application on the site, which the Borough has resolved to grant. An application for a combined heat and power facility has been submitted but not yet determined. The consideration of this application may result in the amendment of the site boundary.

Site 18 Viridor Recycling and Composting Centre, Sutton

Site Description: The site is located on open land which abuts an industrial area. There is sewage works infrastructure surrounding a significant part of the site with some industrial uses to the east. The current waste operator has a licence for the site until 2023, after which the site is intended to become a Country Park within the proposed Wandle Valley Regional Park. Access is from Beddington Lane.

Site Area: 7.43ha.

Proposals Map Designations: Metropolitan Open Land, Metropolitan Green Chain, Land Safeguarded for the Wandle Valley Regional Park, Archaeological Priority Area, Metropolitan Site of Importance for Nature Conservation

Constraints: No direct access to the Strategic Road Network, site intended for strategic open space and nature conservation uses, limited opportunities for utilising sustainable transport modes and a locally protected view.

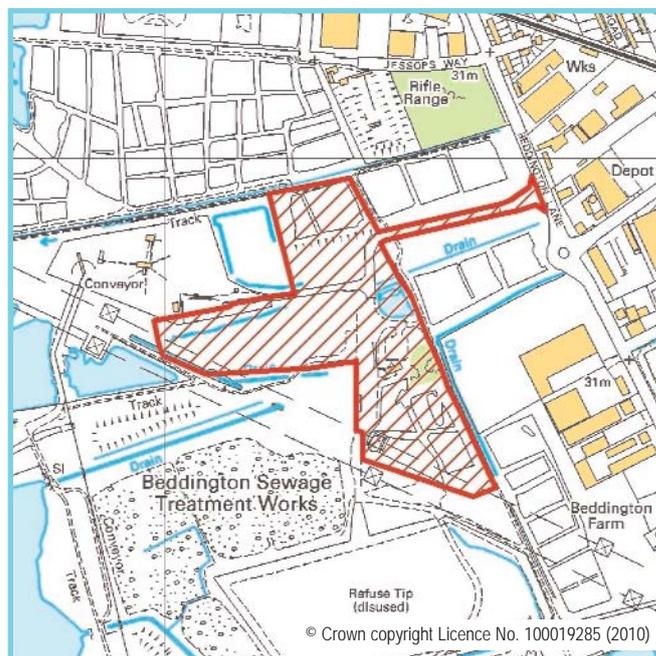
Opportunities: Site already accommodates long-term temporary waste management uses, the site is distant from residential areas and the vehicle routing to the site is primarily through an industrial area.

Objections from Previous Consultations:

Issue Raised	Action Taken
Planning designations should be respected	Schedule 1 indicates waste management use is a temporary use and will not be continued beyond 2023 when the site will become part of the Wandle Valley Regional Park. Also, see Schedule 4, Point 36 regarding restoration and after care
Biodiversity should be protected	Policy WP7 strengthened, see point (b) particularly
The Sewage Treatment Works may need to expand	This is a matter being discussed between the landowners, Thames Water Ltd, and the regulator OFWAT

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Ensuring that the site is made available for the creation of the Wandle Valley Regional Park by virtue of the existing temporary planning permissions and the London Borough of Sutton's resolution to grant temporary planning permission;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;



Site 18 Viridor Recycling and Composting Centre, Sutton (continued)

- Ensuring that traffic to and from the site is routed to avoid residential areas as far as possible and the volume of traffic is not unduly increased;
- Taking measures to maintain the existing nature conservation value of the site;
- Ensuring groundwater and watercourses are not harmed by any development;
- Designing a facility which does not severely impact on the openness of Beddington Farmlands;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- A large number of protected species have been sited. Sightings are recorded as 'Beddington Sewage Farm' which is adjacent to the existing waste facilities. Species recorded in the vicinity of the site include: Annual Knawel, Arctic Tern, Bar-tailed Godwit, Blue-Headed Wagtail, Common Bullfinch, Common Kingfisher, Daubenton's Bat, Eurasian Curlew, Eurasian Tree Sparrow, Common Goldeneye, Green Sandpiper, Eurasian Marsh Harrier, Lesser Spotted Woodpecker, Stag Beetle, House Sparrow, Hedge Accentor, Lesser Redpoll, Northern Pintail, Sand Martin, Reed Bunting, Red Kite, Northern Lapwing, Greylag Goose, Peregrine Falcon, Black-tailed Godwit, Bartailed Godwit, Tree Pipit, Tundra Swan, Yellow Wagtail, Spotted Flycatcher.
- The following protected habitats are located within a 500m radius: Acid Grassland, Standing Water and Woodland

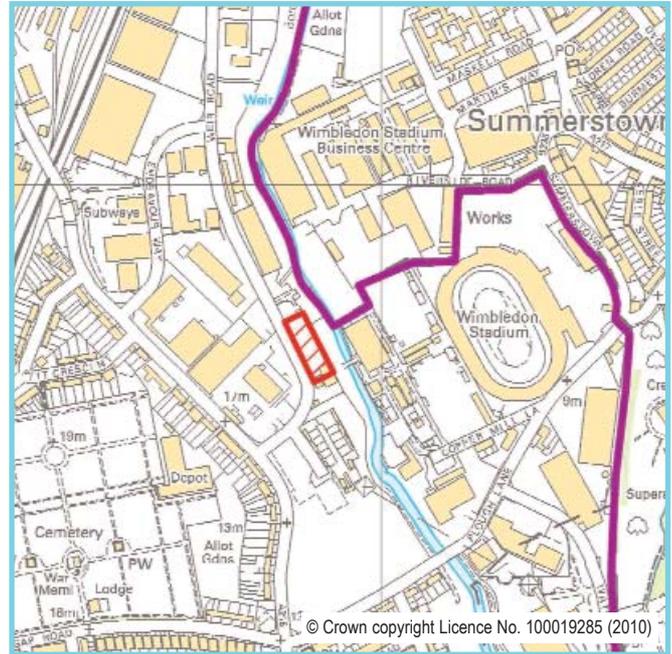
Delivery: The operator has previously submitted an application on the site, which the Borough has resolved to grant.

Site 27: SITA Transfer Station, Merton

Site Description: This small SITA-owned site is located along the eastern boundary of the Dumsford Road Industrial Area and the former open waste transfer use has temporarily ceased while the decision of a planning application for a materials recycling facility is awaited. The surrounding buildings vary between 6m and 20m high. The River Wandle runs along its eastern boundary and the rest of the site borders the remainder of the Dumsford Road Industrial Area. Access to the A218 is gained via the Dumsford Road Industrial Area.

Site Area: 0.25ha

Proposals Map Designations: Industrial Area, Special Industrial Zone, 1 in 100 year floodplain, Archaeological Priority Zone, the River Wandle along the eastern boundary is MOL, SINC, Green Chain and Green Corridor and a Leisure Walking Route (Merton Adopted Unitary Development Plan, 2003). The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.



Constraints: Limited opportunities for sustainable transport, adjacent to a locally important Nature Conservation Area and within a Flood Zone and a Local Archaeological Site.

Opportunities: The site is in an established industrial area and, although not immediately on the Strategic Road Network, it has easy access from a strategic road. The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.

Objections from Previous Consultations:

None raised for this site. However, issues to consider will be similar to those identified for the Dumsford Road Industrial Area (Sites 641 and 642).

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Evaluating and preserving any archaeological remains;

Site 27: SITA Transfer Station, Merton (continued)

- Minimising flood risk on- and off-site;
- Remediating the site of historical contamination
- Developing a facility which could make heat and/or power available to local users
- The following protected habitats are located within a 500m radius: Woodland and Lowland Meadow
- The following protected species are recorded as being sited on or within the vicinity of the site, although records show that all sightings require confirmation: common Kingfisher, Common Linnet, Common Starling, Hedge Accentor, House Sparrow, Pipistrellus, Reed Bunting, Stag Beetle.

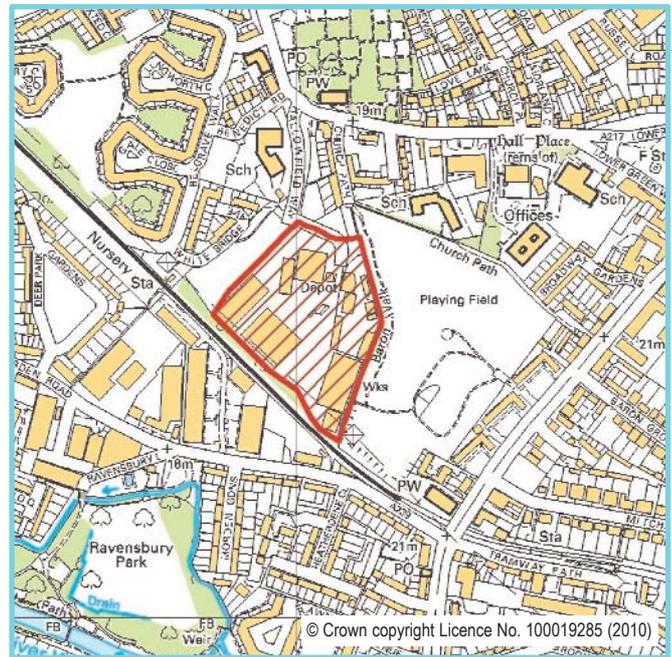
Delivery: At the time of writing, this site is owned by SITA (a waste operator) who has submitted a planning application for a Materials Recycling Facility on the site. In May 2010, SITA expressed no intention to vacate the site or to sell the freehold. Currently it appears that the site has good potential for deliverability in the short, medium and longer term.

Site I26: Benedict Wharf Transfer Station (with MRF), Merton

Site Description: This existing waste site is presently occupied by a waste transfer facility, materials recycling facility and vehicle depot. The Benedict School is opposite the main access point to the north of the site and there are playing fields to the east. To the west, on the opposite side of the tramline, there is an industrial estate and there are houses <100m of the site boundaries to the north-west, south and east. Access to the site is approximately 500m on residential roads after leaving the trunk road network (A217).

Site Area: 3.60ha

Proposals Map Designations: Industrial Area, Site Proposal 10P proposing a BI use and Site Proposal 26P proposing waste treatment facilities, traffic management measures and environmental improvements, adjacent to MOL, Open Space, SINC, Green Chain, Green Corridor and Conservation Areas (Merton Adopted Unitary Development Plan, 2003). The site is within an industrial area designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site, is protected by the London Plan.



Constraints: No direct access to the Strategic Road Network, limited opportunities for sustainable transport, adjacent to a Nature Conservation Area and Strategic Views from neighbouring Conservation Areas, is an archaeological site.

Opportunities: The site is designated for industrial purposes and is currently being used as a waste management facility. The site is designated as a 'Strategic Industrial Location' in the London Plan and as an existing waste site is protected by the London Plan.

Objections from Previous Consultations:

Issue Raised	Action Taken
Views from Conservation Areas	Policy WP7 strengthened, see paragraph I and points (c) and (i) particularly
Nearby residential area	Policy WP7 strengthened, see paragraph I particularly
Traffic Policy	WP7 strengthened, see point (g) particularly

Issues to consider: Developers of the site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;

Site I26: Benedict Wharf Transfer Station (with MRF), Merton (continued)

- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Respecting the character and the views into and from the neighbouring Conservation Areas;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Developing a facility which could make heat and/or power available to local users;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species and habitats that have been sited onsite:
 - In 2008, at Mitcham Recycling centre, Hallowfield Lane Mitcham, a Noctule Bat was sighted "feeding over floodlights over waste transfer station".
 - A Pipistrellus pipistrellus and a Soprano Pipistrelle have also been sighted at Mitcham Recycling centre.
- The following protected species have been sited within the vicinity of the site:
 - To the south west of the site at Ravensbury Park: Daubenton's Bat, a Lesser Noctule, a Pipistrellus Pipistrellus, a Soprano Pipistrelle, a Pipistrellus, a Noctule Bat and a Song Thrush were recorded in 2006 and 2008.
 - To the north west of the site, in Morden Hall Park a Populus nigra subsp. Betulifolia has been recorded.
 - Data indicates a variety of bird and bat species, a few plant varieties and a frog.
- The following protected habitats are located within a 500m radius: Reedbeds, Standing Water and Woodland

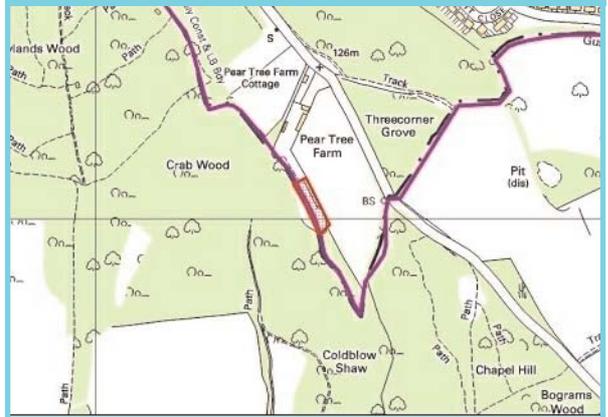
Delivery: At the time of writing, SITA (the current occupier) has submitted a planning application to develop the site for waste management purposes. The consideration of this application may result in the amendment of the site boundary. In May 2010, SITA expressed no intention to vacate the site or to sell the freehold.

2: Fishers Farm, Croydon



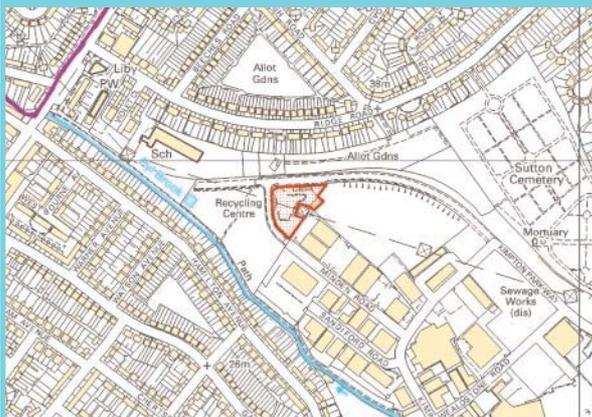
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5: Pear Tree Farm WTS, Croydon



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3: Kimpton Road HWRC, Sutton



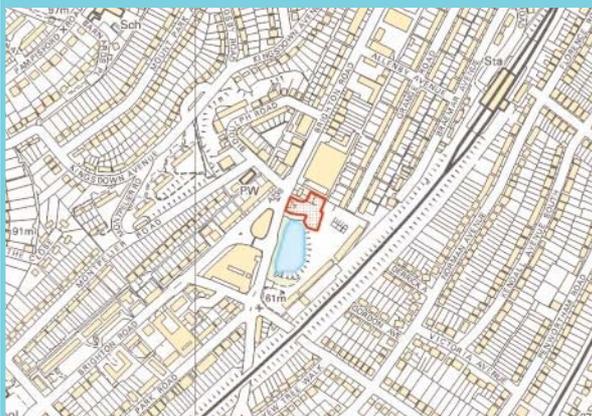
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19: SE Skips/Waste World, Merton



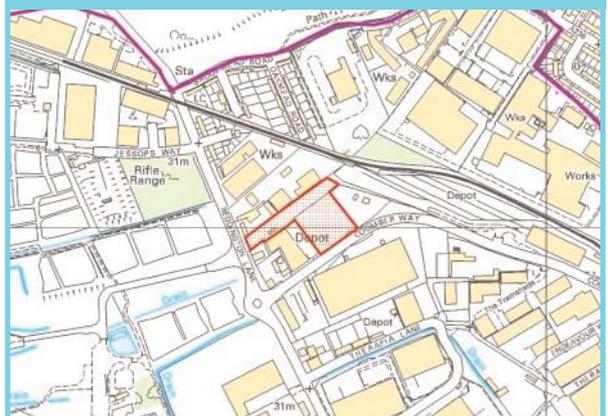
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4: Purley Oaks HWRC, Croydon



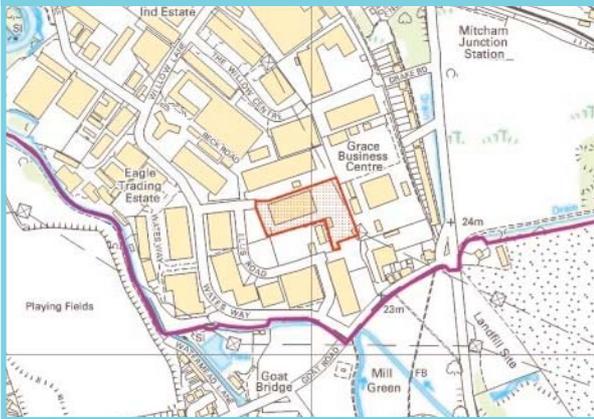
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21: 777 Recycling Centre, Sutton



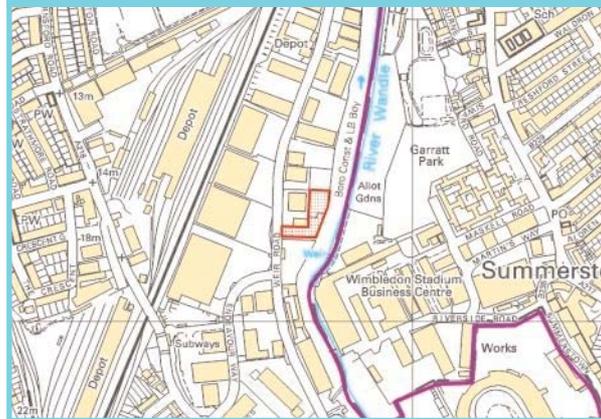
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22: B Nebbett and Son, Merton



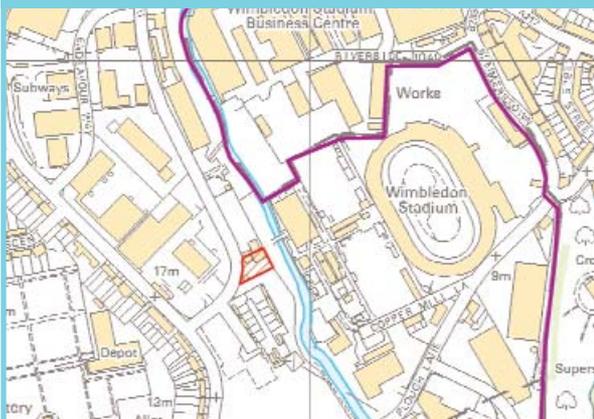
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26: Weir Road HWRC, Merton



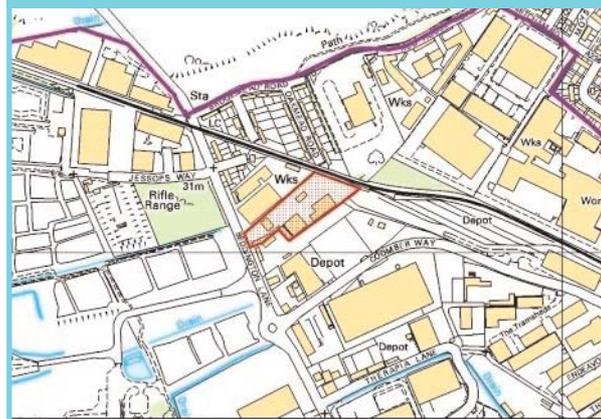
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23: Five Star Auto Repairs, Merton



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97: Severnside Waste Paper, Sutton



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25: Sloane Demolition, Merton

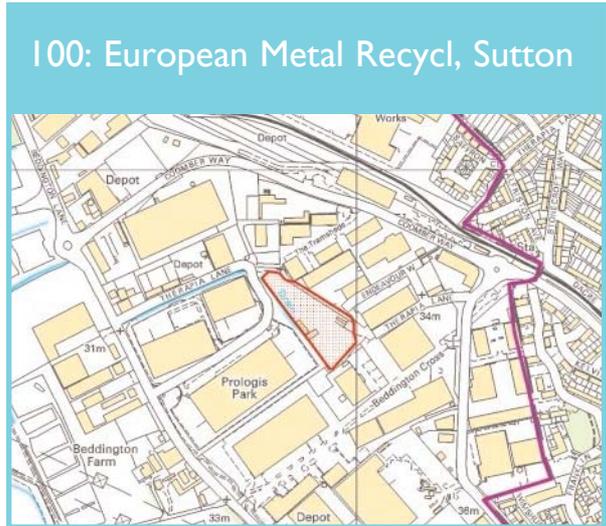


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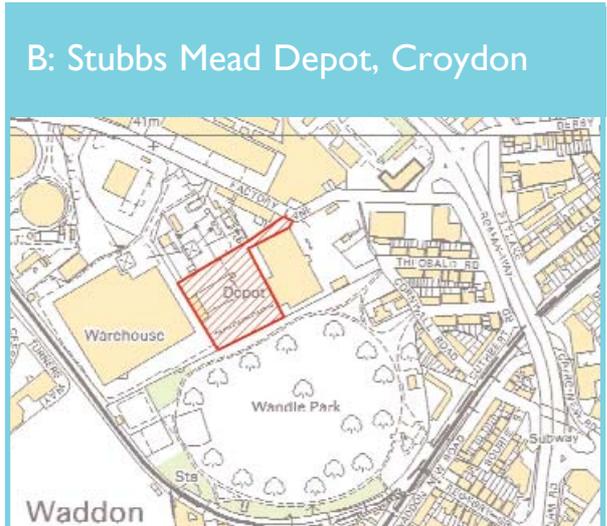
98: Croydon Sta Transfer Station, Sutton



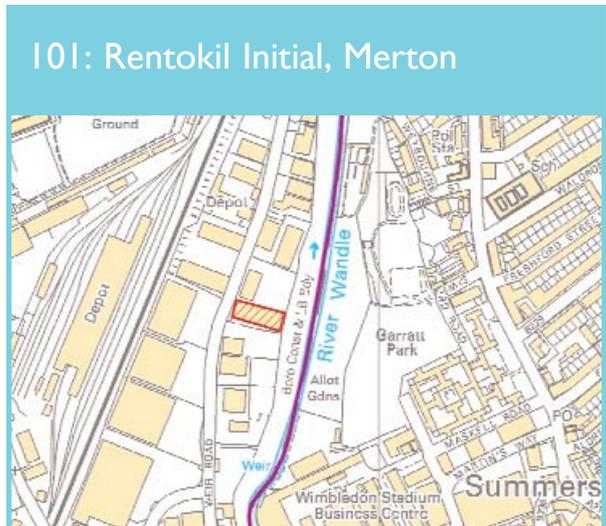
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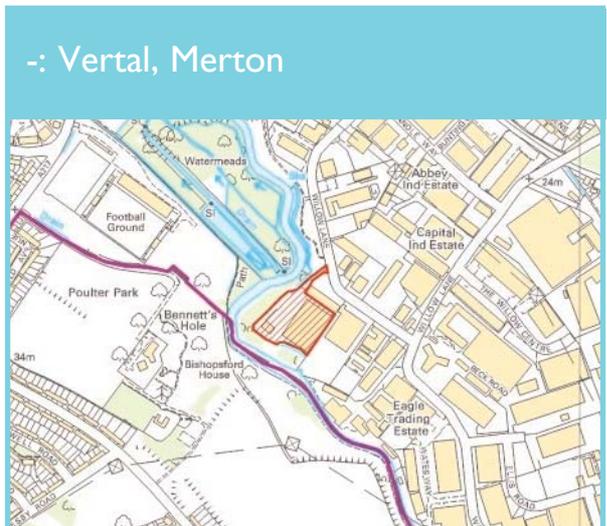
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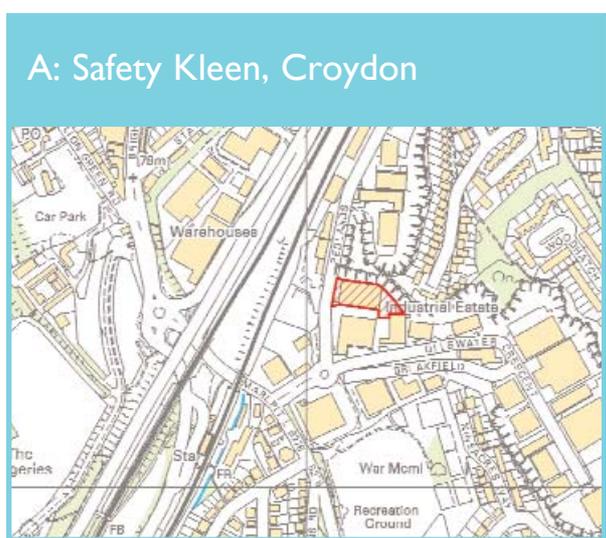
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Industrial Areas with Sites Suitable For Waste Facilities Listed In Schedule 2:

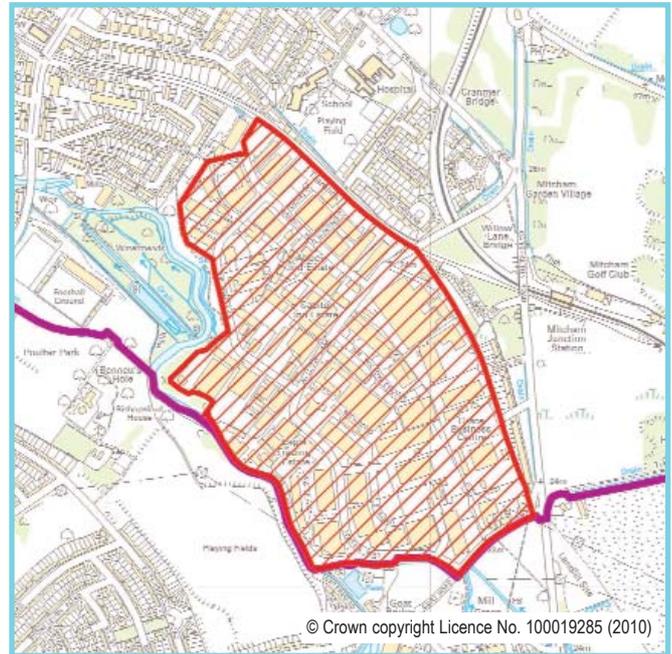
Development of up to 261,240 tonnes of capacity within the following industrial areas will be permitted during the plan period		
Ref No	Site Name	Borough
69	Willow Lane Industrial Area	Merton
99	Purley Oaks Highways Depot	Croydon
102	Purley Way, Lysander Road and Imperial Way Industrial Area	Croydon
105	Factory Lane Industrial Estate	Croydon
125	Factory Lane Industrial Estate (South side)	Croydon
351/352/353	Chessington Industrial Area	Kingston
491	Kimpton Industrial Estate (Land north of Minden Road)	Sutton
532/533/534 535/539/5312	Beddington Industrial Area (Parts of)	Sutton
641/642	Durnsford Road Industrial Area	Merton
702	Garth Road Industrial Area	Merton
1006	Wandle Valley Trading Estate (Part of)	Sutton

Area 69: Willow Lane Industrial Estate , Merton

Site Description: The site is a large multi-use and multi-occupier industrial estate with some existing waste management facilities. The River Wandle runs along the southern and western boundary of the site. There are some houses along the south-eastern boundary but the houses near the north-eastern boundary are separated from the site by a tramline. At the northern and southern ends of the site, the neighbouring houses are separated from the site by a buffer strip of open land. Road access is gained via the A237.

Site Area: 41.45ha

Proposals Map Designations: Industrial Area, Archaeological Priority Zone, the western part of the site is within the 1 in 100 year floodplain and both the River Wandle on the western boundary and Mitcham Common on the eastern boundary are MOL, SINC, Green Chain and Green Corridors (Merton Adopted Unitary Development Plan, 2003). The site is designated as a 'Strategic Industrial Location' in the London Plan.



Constraints: Limited opportunities for sustainable transport, Local Archaeological Site, adjacent to a Nature Conservation Area and within a Flood zone.

Opportunities: The site takes access from a trunk road, is an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan and has numerous existing waste operators.

Objections from Previous Consultations:

Issue Raised	Action Taken
Potential loss of employment	Planning cannot control the number of jobs on any site, only the use of the site.
Located in Flood Zone	Policy WP7 strengthened, see point (d) particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;

Area 69: Willow Lane Industrial Estate , Merton (continued)

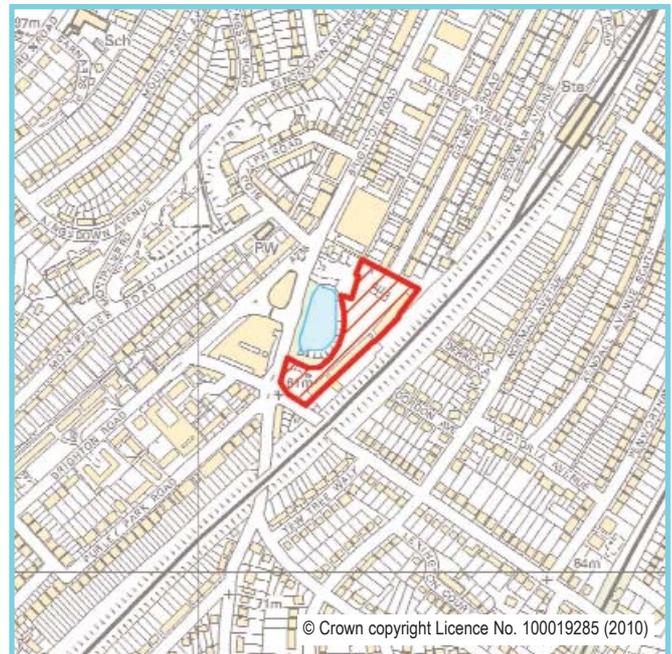
- Respecting and enhancing the adjacent Nature Conservation Area;
- Minimising flood risk on- and off-site;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Evaluating and preserving any archaeological remains;
- The following protected habitats are located within a 500m radius: Acid Grassland, Reedbeds, Standing Water, Woodland and Lowland Meadow
- The following protected species have been recorded within the vicinity of the site:
 - To the north of the site at 'Canons, Madeira Road' the following bat species: Pipistrellus Pipistrellus, Common Pipistrelle, Soprano Pipistrelle were recorded in 2008.
 - The House Sparrow sightings come from the 'LBP Sparrows at Home Survey 2002'.
 - Records for Sand Lizards are for 1969 and comments provided are unclear on location.
 - Data demonstrates a variety of bird species, amphibians, insects and a few plant varieties.

Delivery: At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.

Area 99: Purley Oaks Highways Depot, Croydon

Site Description: The site presently accommodates a council highways and motor transport depot. The site is primarily an open storage yard, with some buildings. The site is bordered to the south-east by business premises and railway lines. Residential properties lie adjacent, to the north and some screening is in place here. A pond lies adjacent to the west. To the north-west of the site is a household waste and recycling centre and the A235. The site has access directly on to A235.

Routing to the site on the A235 is in a primarily residential setting. The predominant building height in the area is two storeys. A five-storey office development is located within 50m of the site.



Site Area: 1.06ha

Proposals Map Designations: The site is within an Archaeology Priority Zone (Croydon Adopted Unitary Development Plan, 2006), is adjacent to Local Open Land and adjacent to a Green Corridor. It is partly within an Area at Risk of Flooding.

Constraints: Site is within Flood Zone 3b, contains a local archaeological site, and has limited opportunities for sustainable transport. The site lies above a Source Protection Zone 2 area. The site is therefore unlikely to be suitable for any waste-related proposal which contains or generates liquid waste, especially if hazardous. To ensure that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage. Any development must provide enhancements to the on-site wetland habitat and must ensure no net loss of wetland habitat.

Opportunities: The site lies next to an existing HWRC facility.

Objections from Previous Consultations:

Issue Raised	Action Taken
Pond has recorded sightings of Kingfisher, common frog and stag beetles (a protected species)	Any development of the site must provide enhancements to the on-site wetland habitat and must ensure no net loss of wetland habitat.
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

Area 99: Purley Oaks Highways Depot, Croydon (continued)

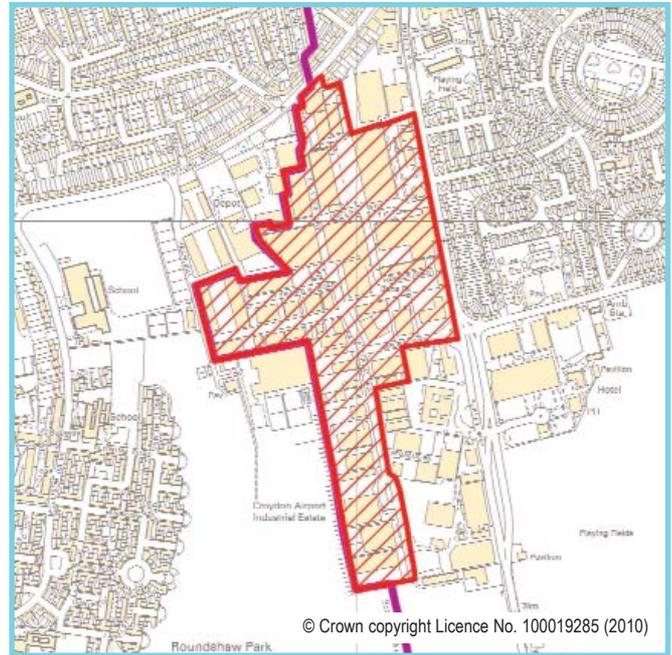
Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Respecting and enhancing the on-site wetlands habitat;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species have been sited on-site or in the vicinity of the site: House Sparrow, West European Hedgehog, Common Kingfisher, Common Frog, Common Toad, Stag Beetle, Vespertilionidae, Dingy Skipper, Mistletoe, Small Heath, Chalk Hill Blue, Red Hemp Nettle, White Helleborine, Shepherd's Needle
- The following protected habitats are located within a 500m radius: Calcareous Grassland and Standing Water

Delivery: The site is owned by Croydon Council. A recent planning application to expand the layout of the adjacent household waste and recycling centre remains undecided.

Area 102 Purley Way, Lysander Road & Imperial Lane Industrial Area,

Site Description: The industrial area lies on Croydon/Sutton boundary. At present, the site is a multi-use, multi-occupier trading estate. Existing uses include manufacturing, warehousing/ storage/distribution, wholesale and motor retail amongst others. Existing buildings are predominantly clad steel frame constructions, with a height of up to approximately 15 metres. The site has direct access to the A23, which forms the eastern boundary of the site. Routing on the A23 beyond the boundaries of the site is in a primarily residential and amenity setting. Open, public space, including sports grounds, surrounds the southern perimeters of the industrial area. The site lies above a protected groundwater aquifer. Any waste related development on this site will therefore require particular attention and investigation of this issue (see 'site constraints' below).



Site Area: 24.69ha

Proposals Map Designations: Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006). It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, adjacent to Metropolitan Open Land. Sutton Council policies will also be relevant. A Grade II Listed Building is nearby. A locally important Nature Conservation Area is also adjacent to the site.

Constraints: The site is close to a locally important nature conservation area, has limited opportunities for sustainable transport, the site contains a local archaeological site. The site lies above a protected groundwater aquifer. The Environment Agency will object in principle to any proposed waste-related development on-site which has the risk of leaching pollutants. The Agency will also object in principle to any waste-related proposal which contains or generates liquid waste, especially if hazardous.

To ensure that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage.

Opportunities: The site is an established Industrial Area.

Objections from Previous Consultations:

Issue Raised	Action Taken
Water pollution	Requirement for any proposal for waste-related development on this site is accompanied by a full assessment of the risk to groundwater. Liaison with the Environment Agency required at the pre-application stage.

Area 102 Purley Way, Lysander Road & Imperial Lane Industrial Area, Croydon (continued)

Objections from Previous Consultations:

Issue Raised	Action Taken
Air pollution	Policy WP7 strengthened, see paragraph 1 particularly
Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Respecting the special character of the historic airport located in close proximity;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following species have been sited on or in the vicinity of the site: Annual Knawel, Common Frog, Common Lizard, Common Starling, Dark Green Fritillary, House Sparrow, Sea Barley, Silver-studded Blu, Sky Lark, Slow-worm, Song Thrush, Spotted Flycatcher, Stag Beetle, West European Hedgehog
- The following protected habitats are located within a 500m radius: Acid Grassland, Calcareous Grassland and Woodland

Delivery: There are opportunities for some waste management facility development in the second half of the plan period.

Area 105 Factory Lane Industrial Estate, Croydon

Site Description: The site is an existing industrial area, is currently in multiple ownership and occupied by multiple tenants. Uses include small light industrial and commercial businesses. There is also a Territorial Army premises and a petrol filling station. The borough's transfer station and a reuse and recycle centre lies to the south of the site. The Wandle Park lies close by, to the south of the site. Active gas holders lie to the south-west of the site and power lines are nearby. Access from part of the site is to Mitcham Road and for the rest access is via Factory Lane to the trunk road network, A235/A236.

Site Area: 7.02ha

Proposals Map Designations:

Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006).

It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, close to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.

Constraints: The site is close to a local Nature Conservation Area. The site has limited opportunities for the movement of waste using sustainable transport. The site is within Flood Zone 2/3b. The site is also an archaeological priority zone.

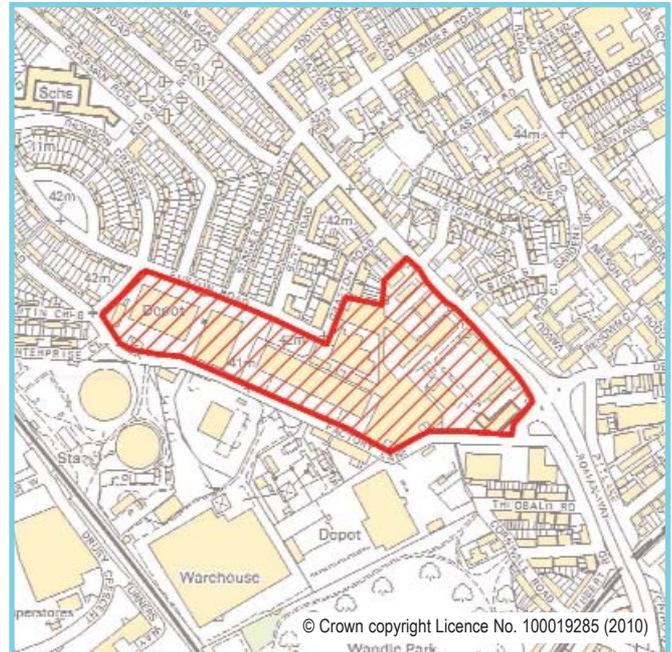
Opportunities: The site is an established industrial area, with established waste use adjacent to the south.

Objections from Previous Consultations:

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Impact wildlife and people using the adjacent Wandle Park	Policy WP7 strengthened, see paragraph 1 particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the nearby Wandle Park;



Area I05 Factory Lane Industrial Estate, Croydon (continued)

- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species have been sited on-site or in the vicinity of the site: Stag Beetle, House Sparrow and Common Starling.

Delivery: Parts of the north-eastern section of the site are recently developed or unlikely to come forward, however, there could be opportunities for some waste management facility development in the second half of the plan period.

Area 125 Factory Lane Industrial Estate (South Side), Croydon

Site Description: The site is part of a larger industrial area. At present, the site accommodates a warehouse occupied by Tesco. It is adjacent to existing waste activity (a transfer station and household re-use and recycling centre) and the local authority's motor vehicle depot. Surrounding uses include small light industrial and commercial businesses. Active gas holders lie to the north-west of the site and power lines are overhead. The site is bordered to the south-east by the Wandle Park. Access from the site is via Factory Lane to the trunk road network, A235/A236.

Site Area: 3.11ha

Proposals Map Designations:

Strategic Employment Location (Croydon Adopted Unitary Development Plan, 2006).

It is also within an Archaeology Priority Zone, subject to the Croydon Panorama arc, adjacent to Local Open Land and a Green Corridor and partly within an Area at Risk of Flooding.

Constraints: Site is close to a locally important nature conservation area, has limited opportunities for sustainable transport, is within Flood Zone 3b, and contains a local archaeological site.

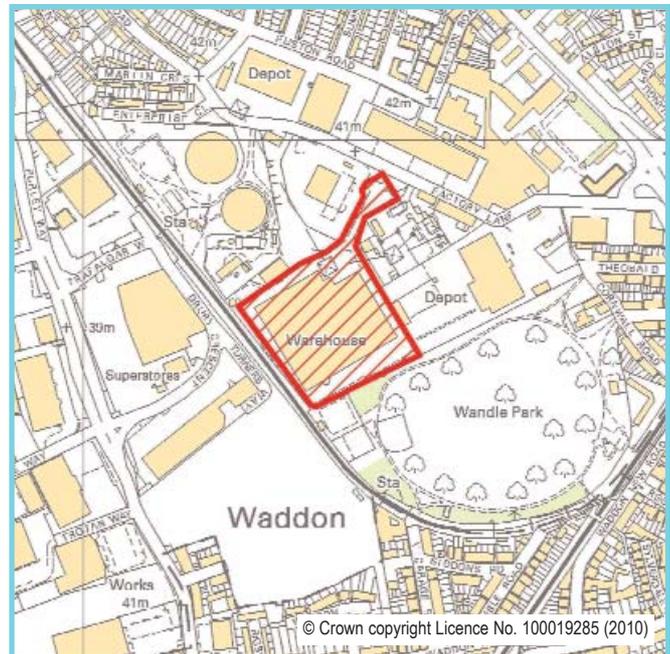
Opportunities: The site is an established industrial area, with established waste use adjacent.

Objections from Previous Consultations:

Issue Raised	Action Taken
Pollution (air, water, noise)	Policy WP7 strengthened, see paragraph 1 particularly
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Impact wildlife and people using the adjacent Wandle Park	Policy WP7 strengthened, see paragraph 1 particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions and noise impacts;
- Protecting the amenity of those using the adjacent Wandle Park;



Area 125 Factory Lane Industrial Estate (South Side), Croydon (continued)

- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Minimising flood risk on- and off-site;
- Any development of this site must consider its siting within the Croydon Panorama arc;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species have been sited onsite or in the vicinity of the site: Stag Beetle, House Sparrow and Common Starling, West European Hedgehog and Mistletoe.

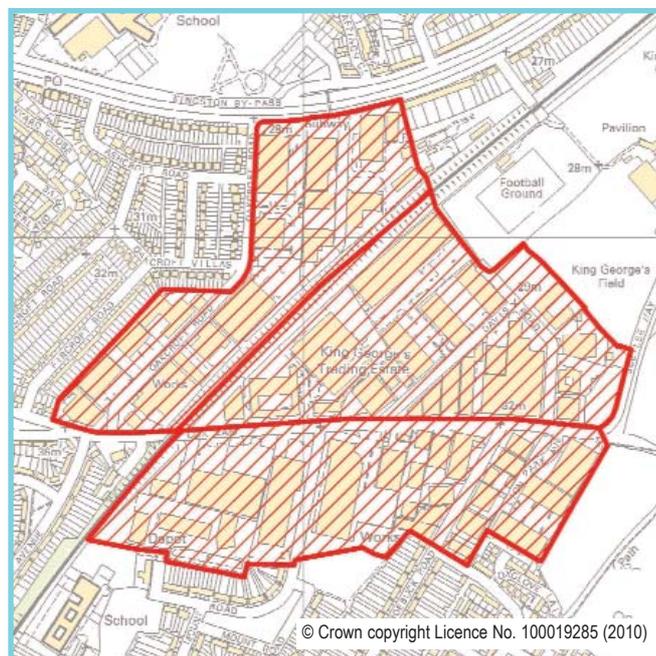
Delivery: Oyster Jersey Property Fund owns the freehold of this site and the current tenant, Tesco, has 10 years remaining on its current lease.

Area 351, 352, 353: Chessington Industrial Area, Kingston

Site Description: The site is located in the south of the borough and is currently in multiple occupancy with a mixture of industrial, warehousing and technology units. Existing buildings range from around 18 metres to 30 metres high. Metropolitan Open Land abuts the industrial area to the east. The site is bordered with residential properties to the south, the west and north east. The A3 abuts the site along its northern edge and an elevated railway line runs through the site, surrounded by a green corridor. Routing to the site is from the A240 is via Cox Lane and Jubilee Way which are suitable for industrial traffic.

Site Area: 34.91ha

Proposals Map Designations: Industrial Area (Kingston Unitary Development Plan, 2005 as amended in 2008) with a green corridor following the elevated railway line through the site.



Constraints: Residential properties adjoin the site to the south, east and north-west of the site. The site is adjacent to Metropolitan Open Land. Local open space and a locally important nature conservation site lie to the south of the site. A drain runs adjacent to the NW portion of this site and development within 5 metres of the top of its bank should be avoided where possible. 7.5-tonne lorry ban zones are in place in some nearby residential areas. Heavy Goods Vehicles must be prevented from using Hook Road South and from heading west under the rail bridge on Cox Lane. Routing to the site is from the A240 is via Cox Lane and Jubilee Way which are suitable for industrial traffic.

Opportunities: Site already accommodates industrial uses, parts of the site (particularly the eastern sections of the site) are distant from residential areas and the permitted vehicle routing to the site is primarily through an industrial area. The site has no flood risk issues. Some existing buildings may be suitable for adaptation to waste use. Development of any site within the industrial area should consider implications of the nearby Tolworth Regeneration Strategy area. There may be opportunities for the supply of heat and power to Tolworth.

Objections from Previous Consultations:

Issue Raised	Action Taken
Traffic	Policy WP7 strengthened, see point (g) particularly
Proximity to residents and local schools	Policy WP7 strengthened, see point (c) particularly
Pollution	Policy WP7 strengthened, see point (e) and (f) particularly
Loss of residential amenity	Policy WP7 strengthened, see paragraph I particularly

Area 351, 352, 353: Chessington Industrial Area, Kingston (continued)

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air quality which is poor as a result of the cumulative effects of various activities;
- Taking measures to maintain the existing nature conservation value of the site, with particular attention to the green corridor which runs alongside the rail line through the site;
- Ensuring groundwater and watercourses are not harmed by any development;
- Ensuring that traffic to and from the site is routed to avoid residential areas and the volume of traffic is not unduly increased;
- Designing a facility which does not significantly impact on the adjacent Metropolitan Open Land.
- Remediating the site of historical contamination
- The following protected species have been sited in the vicinity of the site:
 - To the south of the site at 'Bonesgate Drake Road Open Space-Moor Lane' sightings of birds, a lizard, a bat and a stag beetle have been recorded
 - At the location given as "Bonesgate Cox Lane" various bird species have been recorded.
 - To the south of the site, a common starling and a house sparrow were seen at postcode KT9 2BW and to the south west of the site, at postcode KT9 1BY a Frog, House Sparrow, Smooth Newt, Stag Beetle and West European Hedgehog have been recorded.
 - At postcode KT9 1FX, a Stag Beetle was sighted
 - At the location given as 'Hook,'(King Edward Rec), Redwings have been sighted.
- The following protected habitats are located within a 500m radius: Floodplain Grazing Marsh and Lowland Meadow

Delivery: There are opportunities for some waste management facility development in the second half of the plan period.

Area 49I: Kimpton Road Industrial Estate (Land North of Minden Road), Sutton

Site Description: The area is part of a Strategic Industrial Area which is served by Kimpton Park Way and then the A217.

There is a household recycling centre to the northwest and the site is bounded by industrial uses to the south west and south east. To the north east, there is a newly created park, cemetery and open land. Residential properties are in relatively close proximity.

Site Area: 5.12ha.

Proposals Map Designations:

Strategic Industrial Area.

Constraints: No direct access to the Strategic Road Network, near a local nature conservation area, limited opportunities to utilise sustainable transport modes and close to a residential area.

The site lies above a Source Protection Zone 2 area. The site is therefore unlikely to be suitable for any waste-related proposal which contains or generates liquid waste, especially if hazardous.

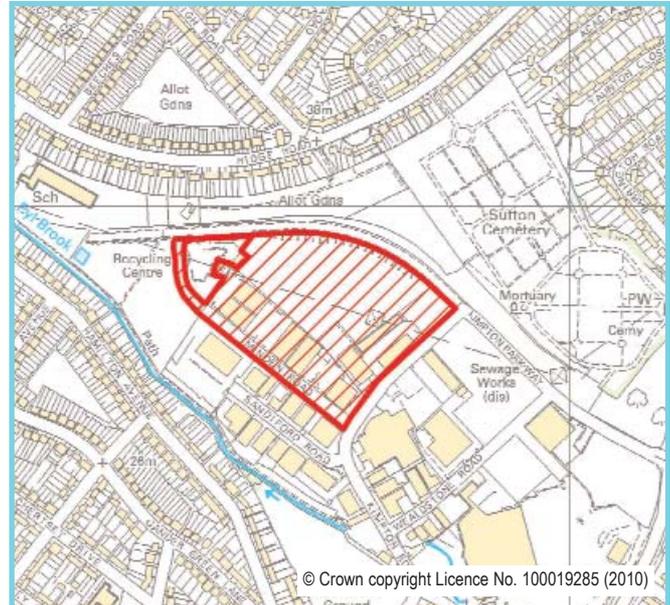
Opportunities: Existing industrial area and close to an existing Household Recycling Centre.

Objections from Previous Consultations:

Issue Raised	Action Taken
Incinerator would not be suitable	Policy WP7 strengthened, see point (g) particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Demonstrating there is a need for the development;
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the amenity of those residential properties in the vicinity of the site;
- Ensuring that risks of pollution to groundwater are investigated and mitigated against, a full assessment of the risks will be needed at the pre-planning application stage, with full liaison with the Environment Agency. The purpose of this assessment would be to consider the inherent risks associated with the proposed waste activity and provide sufficient information to evaluate the likelihood of a release being made. Storage of waste prior to processing also poses a significant risk and will need to be considered at this pre-application stage;
- Ensuring that traffic flow is not unduly increased;
- Ensuring air emissions from the plant and the traffic generated are within acceptable levels;



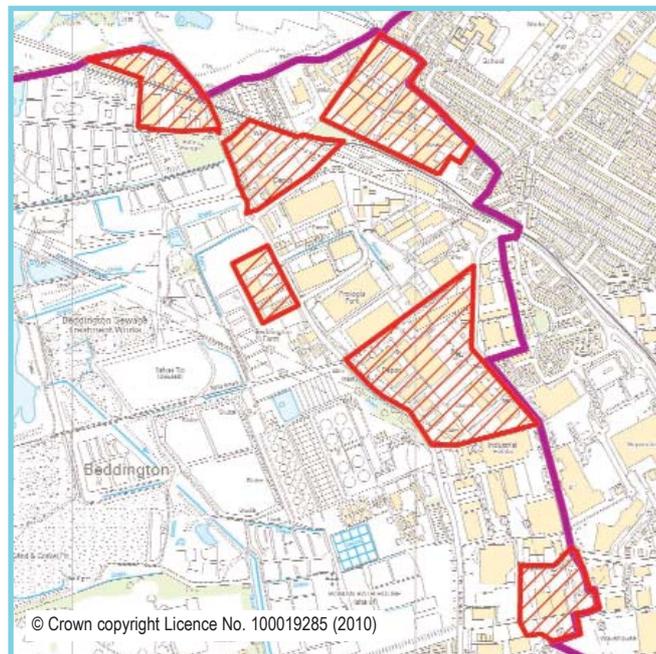
Area 49I: Kimpton Road Industrial Estate (Land North of Minden Road), Sutton (continued)

- Ensuring increases in odour, litter, vermin or birds do not result from the development;
- Ensuring the development is appropriate in design terms with the surrounding area;
- Remediating the site of historical contamination;
- The following protected species have been recorded within the vicinity of the site: Common Frog, Common Linnet, Common Toad, Grape-hyacinth, Hedge Accentor, House Sparrow, Pipistrellus Pipistrellus, Populus nigra subsp. betulifolia, Song Thrush, Soprano Pipistrelle, Stag Beetle.
- The following protected habitats are located within a 500m radius: Calcareous Grassland, Floodplain Grazing Marsh and Lowland Meadow

Delivery: The area has been considered for waste management.

Area 532/533/534/535/539/5312: Beddington Industrial Area (parts of), Sutton

Site Description: A small part of the Beddington Industrial Area may be suitable for the development of waste management facilities. In the Stage 2 'Potential Sites and Policies' consultation document, the area was divided into various zones. The outlined zones on the map above denote those zones within the industrial area considered most suitable in light of the Preferred Sites Technical Report. It does not imply that all these areas will be developed for waste management facilities. The industrial area lies between Beddington Lane and Purley Way (A23) and is occupied primarily by B1, B2 and B8 uses. However, the industrial area also includes a large supermarket and is adjacent to residential areas so some areas of the Beddington Industrial Area are more suitable for waste management facility development than others. The area is already the base for a high traffic generating uses, such as other waste management facilities and logistics operations.



Site Area: 40.38ha.

Proposals Map Designations: Strategic Industrial Location, Archaeological Priority Area

Constraints: Near to a local nature conservation area, limited opportunities for sustainable transport and a locally protected view.

Opportunities: Existing industrial area and close to the Strategic Road Network.

Objections from Previous Consultations:

Issue Raised	Action Taken
Loss on residential amenity	Policy WP7 strengthened, see paragraph I particularly
The site is near a school	Policy WP7 strengthened, see point (c) particularly
Effect on tram stop passengers	Policy WP7 strengthened, see paragraph I particularly
Increase in traffic flow generally	Policy WP7 strengthened, see point (g) particularly
Increase in traffic flow in Beddington Village and the Conservation Area	Policy WP7 strengthened, see point (g) particularly
Increase in odour	Policy WP7 strengthened, see point (h) particularly
Impact on air quality	Policy WP7 strengthened, see point (e) particularly
Accumulation of waste facilities in the Beddington Lane area	Reference in Policy 6.3(B) of the 2011 London Plan.

Area 532/533/534/535/539/5312: Beddington Industrial Area (parts of), Sutton (continued)

Issue Raised	Action Taken
Increase in surface water run-off	Policy WP7 strengthened, see point (d) particularly
Effect on retail uses within the Strategic Industrial Areas	Policy WP7 strengthened, see paragraph 1, particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Demonstrating there is a need for the development;
- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties in the vicinity of the site and ensuring sensitive receptors, such as schools, are not affected by the development;
- Ensuring that traffic to and from the site is routed to avoid sensitive receptors and residential properties as far as possible and traffic flow is not unduly increased;
- Ensuring air emissions from the plant and the traffic generated are within acceptable levels;
- Ensuring increases in odour, litter, vermin or birds do not result from the development;
- Ensuring the development is appropriate in design terms with the surrounding area;
- Evaluating and preserving any archaeological remains;
- Remediating the site of historical contamination;
- The following protected species have been recorded within the vicinity of the sites: Common Starling, Eurasian Tree Sparrow, Hedge Accentor, House Sparrow, Peregrine Falcon, Noctule Bat, Pipistrellus, Serotine, Stag Beetle, West European Hedgehog, Sky Lark
- The following protected habitats are located within a 500m radius: Acid Grassland, Standing Water and Woodland

Delivery: There are opportunities for some waste management facility development in the second half of the plan period.

Area 641/642: Durnsford Road Industrial Area, Merton

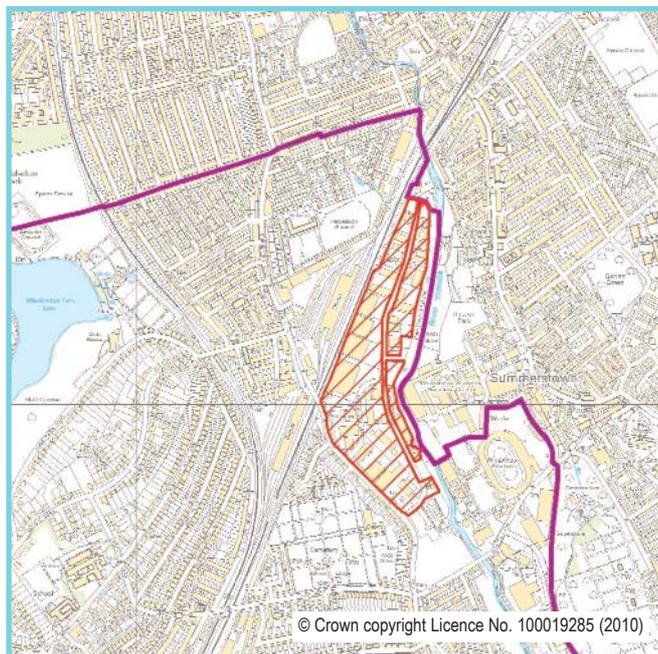
Site Description: The area consists of two parts to the north of Plough Lane and both industrial areas are at present in multiple occupation. Buildings range in height between approximately 8 and 20 metres. Near the boundaries of the site are the River Wandle, allotments, railway lines, residential properties, Wimbledon Stadium and other industrial properties. The site gains direct access from the A218 (Durnsford Road).

Site Area: 16.17ha

Proposals Map Designations: Industrial Area, within the 1 in 100 year floodplain, an Archaeological Priority Zone, and the River Wandle on the western boundary is within MOL, a SINC and a Green Corridor (Merton Adopted Unitary Development Plan, 2003).

Constraints: Limited opportunities for sustainable transport, adjacent to a Conservation Area and Nature Conservation Area, and within a Flood Zone and a Local Archaeological Site.

Opportunities: The site is an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan and gains access from a nearby strategic road



Objections from Previous Consultations:

Issue Raised	Action Taken
Potential loss of employment	Planning cannot control the number of jobs on any site, only the use of the site.
Air Pollution (including dust)	Policy WP7 strengthened, see paragraph 2 and point (e) particularly
Odour	Policy WP7 strengthened, see paragraph 2 and point (h) particularly
Noise	Policy WP7 strengthened, see paragraph 2 and point (f) particularly
Litter	Policy WP7 strengthened, see paragraph 2 and points (h) and (i) particularly
Loss of residential amenity (visual intrusion)	Policy WP7 strengthened, see paragraph 1 and point (i) particularly
Nearby residential area, school and hospital	Policy WP7 strengthened, see paragraph 1 and point (c) particularly
Traffic	Policy WP7 strengthened, see point (g) particularly
Safety and amenity of local cycle routes	Policy WP7 strengthened, see points (a), (g) and (i) particularly. Note other cycling related LDF policies would also apply

Area 641/642: Durnsford Road Industrial Area, Merton (continued)

Objections from Previous Consultations:

Issue Raised	Action Taken
Threat to the neighbouring nature conservation area and contamination of the River Wandle	Policy WP7 strengthened, see points (a), (b) and (d) particularly and note that the site area is limited to the previously developed area
Effect on neighbouring business viability	Policy WP7 strengthened, see paragraph 1 and point (i) particularly. Is in an established industrial area that is designated as a 'Strategic Industrial Location' in the London Plan
Located in Flood Zone	Policy WP7 strengthened, see point (d) particularly
Close to the future Wandle Valley Regional Park	Policy WP7 strengthened, see point (a) particularly
Site 651: Proximity to housing	Site 651 deleted

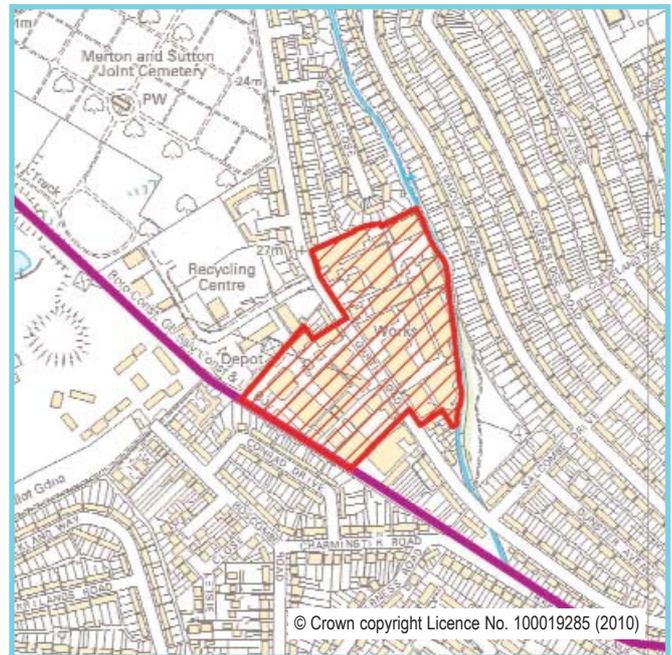
Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as neither to hinder traffic flow on the surrounding roads nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Evaluating and preserving any archaeological remains;
- Minimising flood risk on- and off-site;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Remediating the site of historical contamination
- Developing a facility which could make heat and/or power available to local users
- The following protected species have been recorded within the vicinity of the site: Common Frog, Common Toad, Smooth Newt, Common Kingfisher, Common Linnet, Common Starling, Hedge Accentor, House Sparrow, Reed Bunting, Common Pipistrelle, Stag Beetle, Slow-worm, Pipistrellus Pipistrellus, Vespertilionidae, West European Hedgehog.
- The following protected habitats are located within a 500m radius: Woodland and Lowland Meadow

Delivery: At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.

Area 702: Garth Road Industrial Area, Merton

Site Description: The site is part of a larger industrial area and at present, the site is a multi-use, multi-occupier industrial estate. Existing buildings on this site vary greatly from pre-war brick workshops to more modern steel clad warehouses and heights vary from approx 6-20m. The site borders the remainder of the industrial area along the north-western boundary and residential properties along the north-eastern and southern boundaries. Along the western and eastern boundaries are SINCs and Green Corridors with trees and vegetation, which screen the site from the residential properties beyond. From the A24 to the south of the site, access is gained via Garth Road, which is a residential access road that bisects the site.



Site Area: 5.60ha

Proposals Map Designations:

Industrial Area and the eastern part of the site is within the 1 in 100 year floodplain (Merton Adopted Unitary Development Plan, 2003)

Constraints: No direct access to the Strategic Road Network, limited opportunities for sustainable transport, adjacent to a Nature Conservation Area and within a Flood zone.

Opportunities: The site is an established industrial area.

Objections from Previous Consultations:

Issue Raised	Action Taken
Nearby residential area	Policy WP7 strengthened, see paragraph 1 particularly

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads, nor cause safety concerns for other road and pavement users;
- Respecting and enhancing the adjacent Nature Conservation Area;
- Respecting buffer zones to the Pyl Brook, as advised by the Environment Agency;
- Minimising flood risk on- and off-site;

Area 702: Garth Road Industrial Area, Merton (continued)

- Remediating the site of historical contamination;
- Developing a facility which could make heat and/or power available to local users
- The following protected species have been recorded within the vicinity of the site: Common Linnet, Common Starling, Hedge Accentor, Herring Gull, House Sparrow, Reed Bunting, Sand Martin, Song Thrush, Slow-worm, Common Frog, Common Toad, Daubenton's Bat, Eurasian Badger, Lesser Noctule, Pipistrellus Pipistrellus, Serotine, Soprano Pipistrelle, West European Hedgehog
- The following protected habitats are located within a 500m radius: Standing Water and Lowland Meadow

Delivery: At the time of writing, this site is in multiple ownership and multiple occupation. There are opportunities for some waste management facility development in the second half of the plan period.

Area 1006: Wandle Valley Trading Estate (part of), Sutton

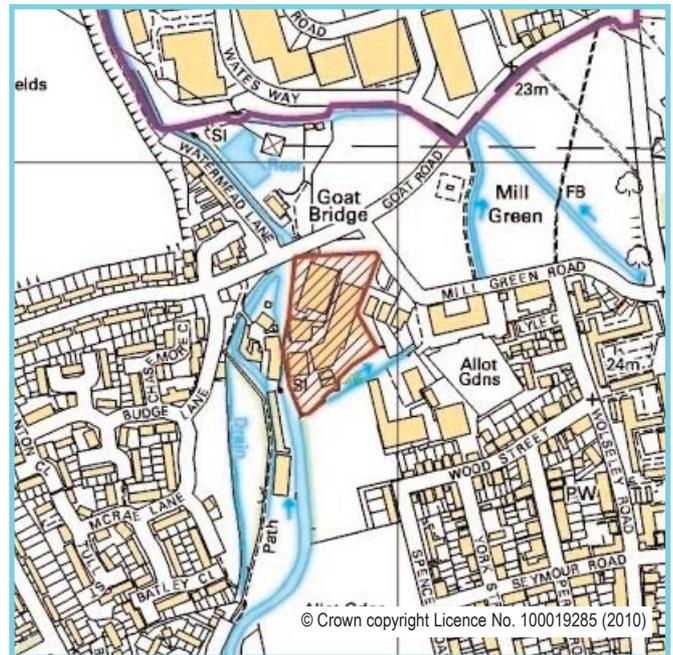
Site Description: The site lies on the northern edge of the Hackbridge Sustainable Suburb. The River Wandle runs adjacent to the site on the west. To the east, the site is adjacent to three listed buildings and there is a Site of Importance for Nature Conservation to the south. It has three vehicular access points. It is currently occupied by a number of different businesses.

Site Area: 1.11ha

Proposals Map Designations: Preferred Location for Industry, Archaeological Priority Area

Constraints: No direct access to the Strategic Road Network, near a local conservation area, near to a locally important nature conservation area, limited opportunities to utilise sustainable transport modes and within Flood Zone 2 mainly (also parts in 3a and 3b).

Opportunities: Established industrial area and close to an area identified for regeneration.



Objections from Previous Consultations:

Issue Raised	Action Taken
Pollution	Policy WP7 strengthened, see points (e) and (f) particularly
Greenfield Site	The site area is limited to the previously developed area
Inconsistent with Sutton's plan for a sustainable Hackbridge	Policy WP7 strengthened and proposals will also have to conform to the London Borough of Sutton's forthcoming Hackbridge Masterplan SPD which will mitigate environmental concerns
Loss of residential amenity	Policy WP7 strengthened, see paragraph 1 particularly
Close to the Wandle Trail	Policy WP7 strengthened, see point (a) particularly
Increase in traffic flow	Policy WP7 strengthened, see point (g) particularly
Loss of Biodiversity	Policy WP7 strengthened and site area is limited to the previously developed area
Already suffering from existing waste facilities and landfill	Policy WP7 strengthened, see paragraph 2 particularly
Effect on property values	Policy WP7 strengthened
Located in Flood Zone 3	Environment Agency has reclassified the site and it is now mostly in Zone 2

Area 1006: Wandle Valley Trading Estate (part of), Sutton (continued)

Issues to consider: Developers of a site for waste purposes should pay particular attention to the following (please note this list is not exhaustive):

- Designing the site so that operations are carried out within a fully enclosed building;
- Protecting the residential amenity of those properties adjacent to, or in the vicinity of the site, especially with regard to air emissions;
- Respecting the special character of the surrounding listed buildings;
- Limiting traffic movements so as not to hinder traffic flow on the surrounding roads;
- Improving public access to the River Wandle;
- Respecting buffer zones to the River Wandle, as advised by the Environment Agency;
- Respecting and enhancing the adjacent nature conservation area;
- Minimising flood risk on- and off-site;
- Evaluating and preserving any archaeological remains;
- Developing a facility which could make heat and/or power available to local users in the Hackbridge Sustainable Suburb area;
- Remediating the site of any contamination;
- The following protected species have been recorded within the vicinity of the site: Chamomile, Common Bullfinch, Common Frog, Common Kingfisher, Common Starling, Crescent, Daubenton's Bat, Hedge Accentor, House Sparrow, Lesser Spotted Woodpecker, Mottled Rustic, Noctule Bat, Palmate Newt, Pipistrellus, Pipistrellus Pipistrellus, Redwing, Reed Bunting, Rosy Rustic, Sand Lizard, Rustic, Sky Lark, Slow-worm, Smooth Newt, Song Thrush, Soprano Pipistrelle, Stag Beetle, Vespertilionidae, West European Hedgehog;
- The following protected habitats are located within a 500m radius: Acid Grassland, Reedbeds, Standing Water and Woodland.

Delivery: The site owner has expressed an interest in developing the site.

Appendix I: Evidence Base

A number of reports and studies were prepared to support the development of the South London Waste Plan's evidence base. They comprised:

- Evidence Base Study 1: Sequential Test for Flood Risk
- Evidence Base Study 2: Source Protection Zones
- Evidence Base Study 3: Deliverability Report
- Evidence Base Study 4: Technical Report (together with previous iterations of the Technical Report)
- Evidence Base Study 5: Environmental Health Considerations
- Evidence Base Study 6: Traffic Considerations
- Evidence Base Study 7: Nature Conservation Considerations
- The Habitats Directive Assessment
- The Sustainability Appraisal

Appendix 2: Schedule of International, National, Regional and Sub- Regional Guidance Used in the Preparation of the South London Waste Plan

International

- Waste Framework Directive (75/442/EEC)
- Directive on the Conservation of Wild Birds (79/409/EEC)
- Directive on Hazardous Waste (91/689/EEC)
- Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC)
- Directive on Integrated Pollution Prevention and Control (96/61/EC)
- Directive on Ambient Air Quality and Management (1996/62/EC)
- Directive on the Landfill of Waste (1999/31/EC)
- Water Framework Directive (2000/60/EC)
- European Directive on the Strategic Environmental Assessment or 'SEA Directive' (2001/42/EC)
- Directive on the Assessment and Management of Environmental Noise (2002/49/EC)
- Directive on Waste Electrical and Electronic Equipment or 'WEEE Directive' (2002/96/EC)
- Directive on the Management of Waste from Extractive Industries (2006/21/EC)
- Directive on Hazardous Substances in Electrical and Electronic Equipment (2002/95/EC)
- Waste Framework Directive (2006/12/EC)
- Directive on the Promotion of the Use of Energy from Renewable Sources (2009/28/EC)

National

- The Planning and Compulsory Purchase Act (2004)
- The Wildlife and Countryside Act (1981)
- The Environmental Protection Act (1990)
- The Radioactive Substances Act (1993)
- The Conservation (Natural Habitat &c) Regulations (1994)
- The Environment Act (1995)
- The Disability Discrimination Act (1995)
- The Race Relations Amendment Act (2000)
- The Household Waste Recycling Act (2003)
- The Waste and Emissions and Trading Act (2003)

- The Natural Environment and Rural Communities Act - Habitat and Species of Principal Importance in England (2006)
- The Climate Change Act (2008)
- The Energy Act (2008)
- Environmental Protection (Duty of Care Regulations (Statutory Instrument 2839/1991))
- The Landfill (England and Wales) Regulations (SI 1559/2002)
- The Waste Management (England and Wales) Regulations (SI 937/2006)
- Community Infrastructure Levy Regulations (SI948/2010)
- PPS1: Delivering Sustainable Development (2005)
- PPS: Planning and Climate Change - Supplement to PPS1 (2007)
- PPG2: Green Belts (2001)
- PPS3: Housing (2006)
- PPS4: Planning for Sustainable Economic Growth (2009)
- PPS5: Planning for the Historic Environment (2010)
- PPS9: Biodiversity and Geological Conservation (2005)
- PPS10: Planning for Sustainable Waste Management (2005)
- PPS12: Local Spatial Planning (2008)
- PPG13: Transport (2001)
- PPG14: Development on Unstable Land (1990)
- PPG16: Archaeology and Planning (1990)
- PPS22: Renewable Energy (2004)
- PPS23: Planning and Pollution Control (2004)
- PPG24: Planning and Noise (1994)
- PPS25: Development and Flood Risk (2010)
- Circular 02/99: Environmental Impact Assessment
- Circular 04/00: Planning Controls for Hazardous Substances
- Circular 05/05: Planning Obligations
- National Waste Strategy (Department for the Environment, Food and Rural Affairs, 2007)
- Air Quality Strategy for England: Working Together for Clean Air (DEFRA, 2007)
- Guidance for Local Authorities on Implementing the Biodiversity Duty (DEFRA, 2007)
- Designing Waste Facilities - A Guide to Modern Design in Waste (DEFRA/Commission for Architecture and the Built Environment, 2008)

- Strategy for Sustainable Construction (Department of Business, Enterprise and Regulatory Reform, 2008)
- UK Renewable Energy Strategy (Department of Energy and Climate Change, 2009)
- Health Technical Memorandum 07/01 (Department of Health, 2006)

Regional

- The London Plan (GLA, 2011)
- The Consolidated Draft Replacement London Plan (GLA, 2010)
- The Draft Replacement London Plan (GLA, 2009)
- The London Plan (Consolidated with Alterations since 2004) (GLA, 2008)
- London Plan SPG: Sustainable Design and Construction; (GLA, 2006)
- London Plan SPG: Industrial Capacity (GLA, 2008)
- South London Sub-Regional Development Framework; (GLA, 2006)
- The Mayor's Air Quality Strategy: 'Cleaning London's Air' (GLA, 2002)
- The Mayor's Municipal Waste Management Strategy: Rethinking Rubbish in London; (GLA, 2004)
- The Mayor's Energy Strategy: Green Light to Clean Power (GLA, 2004)
- Recycling and Recovery Facilities - A Site Investigation in London (GLA, 2005)
- The Mayor's Ambient Noise Strategy (GLA, 2004)
- The Mayor's Climate Change Action Plan (GLA, 2007)
- The Mayor's Draft Water Strategy (GLA, 2009)
- Powering Ahead: Delivering Low Carbon Energy for London (GLA, 2009)
- Clearing the Air: The Mayor's Draft Air Quality Strategy (GLA, 2010)
- Draft London Climate Change Adaptation Strategy (GLA, 2010)
- Draft Municipal Waste Strategy (GLA, 2010)
- Rubbish In - Resources Out: Design Ideas for Waste Facilities in London (GLA, 2008)

Sub-Regional

- Joint Waste Statement (South London Waste Partnership, 2007)
- Outline Business Case (SLWP, 2008)
- Residual Waste Treatment Descriptive Document (SLWP, 2009)
- Joint Municipal Waste Management Strategy (SLWP, 2011)

- Croydon's Draft Community Strategy (London Borough of Croydon, 2010)
- Shaping Our Future 2008-2011 - Croydon's Community Strategy (LBC, 2008)
- Croydon Unitary Development Plan (The Croydon Plan) (LBC, 2006)
- Croydon UDP Proposals Map (LBC, 2006)
- UDP Saved Policies (LBC, 2009)
- Croydon's Core Strategy - Towards a Preferred Core Strategy (Supplement) (LBC, 2010)
- Croydon's Core Strategy - Towards a Preferred Core Strategy (LBC, 2010)
- Towards A Preferred Core Strategy Interim SA Report (LBC, 2010)
- Core Strategy Issues and Options - Initial Report (LBC, 2009)
- Draft Infrastructure Delivery Plan (LBC, 2010)
- Strategic Flood Risk Assessment for London Borough of Wandsworth, London Borough of Merton, London Borough of Sutton, London Borough of Croydon - Level 1 Report (Scott Wilson, 2008)
- Statement of Community Involvement (LBC, 2007)
- SPD Planning Obligations (LBC, 2005)

- Kingston Plan - Kingston's Vision for 2020 (Royal Borough of Kingston upon Thames, 2020)
- Kingston Core Strategy Preferred Options (RBK, 2009)
- Kingston Core Strategy Preferred Options - Consultation Report (RBK, 2009)
- Sustainability Appraisal on Kingston Core Strategy Preferred Options (RBK, 2009)
- Kingston Unitary Development Plan (RBK, 2005)
- Kingston UDP Proposals Map (RBK, 2005)
- UDP Saved/Deleted Policies Schedule (RBK, 2008)
- Statement of Community Involvement (RBK, 2009)
- Employment Land Review (RBK, 2008)
- Draft Infrastructure Delivery Plan (RBK, 2009)
- SPD Planning Obligations (RBK, 2010)

- Community Plan 2009-2019 (London Borough of Merton, 2009)
- Merton Core Strategy Pre-submission (LBM, 2010)
- Sustainability Appraisal on Merton Pre-submission Core Strategy (LBM, 2010)
- Merton Unitary Development Plan (LBM, 2003)

- Merton UDP Proposals Map (LBM, 2003)
- List of Deleted UDP Policies (LBM, 2007)
- Statement of Community Involvement (LBM, 2006)
- Employment and Economic Land Study (LBM, 2010)
- Employment Land Study - Summary (LBM, 2005)
- Infrastructure Needs Assessment (LBM, 2008)
- Strategic Flood Risk Assessment for LBM - Level 2 (Scott Wilson, 2009)
- SPD Planning Obligations (LBM, 2006)

- The Sutton Strategy (London Borough of Sutton, 2009)
- Core Planning Strategy Adopted (LBS 2009)
- Sustainability Appraisal on Sutton Core Planning Strategy Pre-Submission (LBS, 2009)
- Sutton Unitary Development Plan (LBS, 2003)
- Sutton UDP Proposals Map (LBS, 2003)
- Sutton UDP Schedule of Saved Policies (LBS, 2007)
- Sutton Employment Land and Premises Study (Atkins, 2005)
- Statement of Community Involvement (LBS, 2006)
- Infrastructure Needs Study (LBS, 2009)
- SPD Planning Obligations (LBS, 2007)

Appendix 3: Glossary

Aerobic In the presence of oxygen

Agricultural Waste Waste generated on farms or other agricultural premises such as market gardens. It consists of a diverse range of both natural (organic) and non-natural wastes including discarded pesticide containers, plastics such as silage wrap, bags and sheets, packaging waste, tyres, batteries, old machinery and oil

Anaerobic In the absence of oxygen

Anaerobic Digestion (AD) A process in which biodegradable material is encouraged to break down in the absence of oxygen. Waste is broken down in an enclosed vessel under controlled conditions, resulting in the production of digestate and biogas

Apportionment The amount of London's waste a borough or group of boroughs should manage, according to the current iteration of the London Plan

Biodegradable Capable of being degraded by plants and animals

Biodegradable Municipal Waste (BMW) includes paper and card, food and garden waste, and a proportion of other wastes, such as textiles

Biogas Gas Gas resulting from the fermentation of waste in the absence of air (methane/carbon dioxide)

Biological Material Recovery Facility (Bio-MRF) Bio-MRFs dry and stabilise waste before sorting out further materials for recycling, energy recovery (production of a renewable fuel) and disposal

Biological Treatment A treatment technology that uses bacteria to consume organic waste

Capacity Gap The deficit between the amount of waste that should be managed within a local authority's boundaries according to an apportionment and the actual, existing waste management capacity within the boundaries

Commission for Architecture and the Built Environment (CABE) Government's advisor on architecture, urban design and public space

Civic Amenity Site (CAS)

See Household Waste and Recycling Centres

Clinical Waste Waste arising from medical, nursing, veterinary, pharmaceutical, dental or related practices, where risk of infection may be present

Combined Heat and Power (CHP)/

Combined Cooling, Heat and Power (CCHP)

The combined production of electricity and usable heat, steam or hot water, which would otherwise be rejected when electricity alone is produced. It is used for space or process cooling or heating

Commercial and Industrial Waste (C&I)

Waste arising from business and industry. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste arising from the activities of traders, catering establishments, shops, offices and other businesses. Commercial and Industrial waste may, for example, include food waste, packaging and old computer equipment

Communities and Local Government (CLG)

Former name of the Department for Communities and Local Government

Composting The biological decomposition of organic material by micro-organisms under controlled, aerobic conditions

Construction, Demolition & Excavation Waste (C,D&E)

Waste building materials, packaging, rubble from construction and remodelling, repair and demolition operations on roads, houses, commercial buildings and other structures and excavation waste

Core Strategy Sets out the long-term spatial vision for the local planning authority area, the spatial objectives and outlines the strategic policies required to deliver that vision

Department for Communities and Local Government (DCLG) Government department with national responsibility for planning

Department for Environment Food and Rural Affairs (DEFRA) Government department with national responsibility for waste management

Development Plan Document (DPD)

Spatial planning documents within the portfolio of Local Development Documents in a Local Development Framework

Digestate Solid and liquid product resulting from anaerobic digestion

Disposal Final placement or destruction of toxic, radioactive or other wastes. Disposal may be accomplished through use of approved secure landfills, surface impoundments, land farming, deepwell injection, ocean dumping or incineration

Draft Replacement London Plan This document was published by the Mayor of London in October 2009 to update the 2008 London Plan (see London Plan). The Draft Replacement London Plan contains new apportionments of waste as well as new waste projections for the period until 2031

Dry Recyclables Dry recyclable household waste includes: papers (newsprint, pamphlets, envelopes, and books), food tins (steel), drink cans (aluminium), milk and juice cartons and plastic bottles

Energy Recovery Obtaining energy from waste through a variety of processes (e.g. combustion, combined heat and power and anaerobic digestion)

Environment Agency (EA)

Environmental regulatory authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty's Inspectorate of Pollution

Exempt Sites Exempt from Waste Management Licensing by the Environment Agency

Flood Zones Planning Policy Statement 25 "Development and Flood Risk" identifies a number of flood zones from Flood Zone 1 (land least at risk of flooding) to Flood Zones 3a and 3b. Flood Zone 3b is the functional floodplain and comprises land where water has to flow or be stored in times of flood

Gasification The process whereby carbon-based wastes are heated in the presence of air or steam to produce fuel-rich gases. The technology is based on the reforming process used to produce town gas from coal

Greater London Authority (GLA)

Regional government for London

Green Belt A planning designation aimed at preventing urban sprawl by keeping land permanently open; the most important attribute of green belts is their openness

Ha hectare

Habitats Regulations Assessment

Assessment of the impacts of implementing a plan or policy on an internationally important habitat such as SACs or SPAs

Hazardous Waste Waste which, because of its characteristics, poses a present or potential hazard to human health or the environment

Household Waste Waste from a private dwelling or residential house or other such specified premises, and includes waste taken to civic amenity site

Household Waste and Recycling Site (HWRC)

A facility provided by the Waste Disposal Authority that is available to the public to deposit waste which cannot be collected by the normal household waste collection round. Also known as Civic Amenity Sites

Incineration The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Municipal solid waste incinerators recover power and/or heat

Inert Waste Waste that does not normally undergo any significant physical, chemical or biological change when deposited at a landfill site. It may include materials such as rock, concrete, brick, sand, soil or other material arising from construction, excavation or demolition

In-vessel Composting (IVC) The aerobic decomposition of shredded and mixed organic waste within an enclosed container, where the control systems for material degradation are fully automated. Moisture, temperature and odour can be regulated and stable compost can be produced much more quickly than open windrow composting

Landfill Disposal sites for non-hazardous solid wastes spread in layers, compacted to the smallest practical volume, and covered by material applied at the end of each operating day

Landfill Allowance Trading Scheme (LATS)

Process of apportionment, by a waste disposal authority, of the tonnage of biodegradable municipal waste that may be disposed of to landfill to meet EU Landfill Directive targets

Landfill Tax A tax introduced in 1996 by HM Customs and Excise on waste deposited in licensed landfill sites, with the aim of encouraging more sustainable waste management methods and generation of funds for local environmental projects. Revised in 2003

Local Development Framework (LDF)

A portfolio of Local Development Documents providing the spatial planning framework for an area

London Plan Refers to the current iteration of the London Plan which was adopted in 2011. It replaced the London Plan (Consolidated with Alterations since 2004) which was adopted in 2008. It is the strategic spatial planning document for London

Mechanical Biological Treatment (MBT)

A generic term for mechanical sorting/separation technologies used in conjunction with biological treatment processes, such as composting

Mechanical Heat Treatment (MHT) A process which uses a combination of heat, air and moisture to clean and sanitise mixed recyclables to produce easily segregated recyclate and a residual organic material that can be used as a solid recovered fuel in other processes. Mechanical Heat Treatment does not involve the burning of waste

Mechanical Pre Treatment (MPT) A process that takes place prior to Mechanical Biological Treatment and involves preparing the waste for further management, such as re-use, recycling or composting. It typically involves shredding, sieving and/or magnetic separation

Materials Recycling Facility/Material Recovery Facility (MRF) Dedicated facility for the sorting/separation of recyclable materials

Metropolitan Open Land (MOL) Undeveloped land within London's boundary that is of strategic importance and is afforded a similar protection as Green Belt

Mixed Waste Mixed waste can refer to any combination of waste types with different properties

Municipal Solid Waste (MSW) Waste collected by local authorities. Mainly composed of household waste but also includes street cleaning waste, waste from reuse and recycling centres and commercial and industrial waste collected by a local authority

Office of the Deputy Prime Minister (ODPM)

Former name of the Department for Communities and Local Government

Planning & Compulsory Purchase Act 2004

Planning Act that came into force in 2004 and introduced reforms to the Town and Country Planning system

Planning Policy Statements (PPSs) Statements of national planning policy replacing Planning Policy Guidance notes under the Planning & Compulsory Purchase Act 2004

Pollution Prevention and Control (PPC)

Regulates certain types of business, such as those carrying out power generation, waste management activities, manufacturing and other industrial and agricultural activities. A PPC permit is required by companies carrying out activities covered under PPC. PPC is regulated by the Environment Agency or local council, depending on the activity

Private Finance Initiative (PFI) Partnership between public and private sectors

Pyrolysis During pyrolysis organic waste is heated in the absence of air to produce a mixture of gaseous and liquid fuels and a solid, inert residue (mainly carbon)

Recovery To obtain value from waste through recycling, composting, energy recovery or other forms of material recovery, such as anaerobic digestion

Recycling Involves the processing of wastes, into either the same product or a different one

Refuse Derived Fuel (RDF) A fuel produced from combustible waste that can be stored and transported, or used directly on site to produce heat and/or power

Reprocessing Using materials recovered from waste to manufacture a new product.

Residual Waste Waste left from the household sources containing materials that have not been separated out or sent for recycling

Re-use The re-use of materials in their original form, without any processing other than cleaning

Self-Sufficiency Dealing with all wastes within the administrative region (such as London) where they are produced

Site of Special Scientific Interest (SSSI)

A national nature conservation designation

Solid Recovered Fuel (SRF) is a fuel produced by producing by shredding and dehydrating solid waste with a waste converter technology. SRF is a refined form of Refuse Derived Fuel (qv) which meets EU standards

Special Area of Conservation (SAC)

Designation made under the Habitats Directive to ensure the restoration or maintenance of certain natural habitats

Special Protection Area (SPA) Sites classified under the European Community Directive on Wild Birds to protect internationally important bird species

Strategic Road Network (SRN) The network of primary roads in the boroughs

South London Waste Partnership (SLWP)

A partnership between the four South London boroughs (Croydon, Kingston, Merton and Sutton) set up for the purposes of a joint waste procurement exercise. The SLWP will procure and run a joint contract that will cover the treatment and disposal of waste and the management of the four boroughs' household re-use and recycling centres and the transport of waste. The contract will only cover municipal solid waste

Sub-Region A division of a region - London is a region and South London is a sub-region. The South London Sub-Region consists of the boroughs of Bromley, Croydon, Kingston, Merton, Richmond, Sutton and Wandsworth

Sustainability Appraisal (SA) A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental, social and economic factors. The Planning and Compulsory Purchase Act 2004 requires local planning authorities to undertake a sustainability appraisal of all development plan documents

Sustainable Community Strategy A strategy prepared by local authorities to help deliver local community aspirations under the Local Government Act 2000

Sustainable Waste Management Using material resources efficiently to cut down on the amount of waste we produce and, where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development

Thermal Treatment The general term used for waste management technologies designed to generate power, and often to recover heat, through the combustion of waste

Tpa tonnes per annum

Transfer The handling and transport of waste

Transfer Station Facility where solid waste is transferred from collection vehicles to larger trucks or rail cars for longer distance transport

Transport for London (TfL) An integrated body responsible for the capital's transport system. The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London's Transport Strategy and manage transport services across London

Treatment Treatment is any process that changes the physical, chemical, or biological character of a waste to make it less of an environmental threat

Unitary Development Plan (UDP) Statutory development plan prepared by Unitary Authorities. To be replaced by a Local Development Framework under the Planning & Compulsory Purchase Act 2004

Waste Arising The amount of waste generated in a given locality over a given period of time

Waste Electrical and Electronic Equipment (WEEE) The directive aims to prevent the disposal of electrical and electronic goods and ensure greater levels of recovery and disassembly

Waste Facility A facility on a site where waste is sorted, processed, recycled, composted or disposed of (list not exhaustive) or a facility on a site where waste is transferred from collection vehicles to larger trucks or rail cars for longer distance transport

Waste Hierarchy The waste hierarchy acts as a guide when determining the most sustainable waste management options from the ideal of prevention to disposal as the last resort

Waste Management Capacity The amounts of waste able to be managed (recycled or energy recovered) by waste management facilities within South London

Waste Management Facility A facility on a site where waste is sorted, processed, recycled, composted or disposed of (list not exhaustive). The capacity of any waste transfer facility on the site would be ancillary to the primary waste management function of the site

Waste Management Licence (WML) The licence required by anyone who proposes to deposit, recover or dispose of controlled waste. Licences are issued and monitored by the Environment Agency

Waste Minimisation Reducing the volume of waste that is produced. This is at the top of the Waste Hierarchy

Waste Planning Authority (WPA) Local authority responsible for waste planning. In South London all four boroughs are the Waste Planning Authority for that area

Waste Return Form returned to the Environment Agency quarterly by waste management licence holders detailing the type and quantity of waste processed at each licensed site

Waste Transfer Facility A facility on a site where waste is transferred from collection vehicles to larger trucks or rail cars for longer distance transport. The facility could be on a site where other waste management facilities are also operational

Waste Transfer Station (WTS) A site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling or disposal. Any sorting or waste management facility would be ancillary to the primary transfer function of the site

Windrow Composting The aerobic decomposition of appropriate shredded biodegradable waste using long narrow piles, known as 'windrows'. The process involves mechanical turning and remixing of the material to enable effective degradation. This results in a bulk-reduced, stabilised residue known as compost. Windrow composting can take place outdoors or within buildings and the process takes around three months

Appendix 4: Evidence of Compliance with the EU Waste Framework Directive (2008/98/EC)

Part I: How the South London Waste Plan is Compliant with All Articles of the EU Waste Framework Directive

Framework Articles	Corresponding South London Waste Plan policy
Article 1: Subject, matter, scope	Descriptive
Article 2: Exclusions from scope	Descriptive
Article 3: Definitions	Descriptive
Article 4: Waste hierarchy shall apply along with the best overall environmental outcome. Waste policy development should be transparent. Environmental protection, sustainability, technical feasibility and economic viability, protection of resources, overall environmental, human health, economic and social impacts should be taken into account.	South London Waste Plan. See Policies WP1, WP6, WP7, WP8 and WP9.
Article 5: By-products may not be classified as waste	South London Waste Plan. See Policies WP1 and WP8
Article 6: Recycling does not constitute waste production provided there is no environmental or amenity impacts.	South London Waste Plan. See Policies WP1 and WP7
Article 7: List of waste	Environment Agency matter
Article 8: Extended producer responsibility	National Government matter
Article 9: Prevention of waste	European Union matter
Article 10: Recovery	South London Waste Plan. See Policies WP1 and WP7
Article 11: Re-use and recycling	South London Waste Plan. See monitoring of Policy WP1
Article 12: Disposal	South London Waste Plan. See Policy WP7
Article 13: Protection of human health and the environment	South London Waste Plan. See Policy WP7
Article 14: Costs	National Government matter
Article 15: Responsibility for waste management	National Government matter
Article 16: Principles of self-sufficiency and proximity	South London Waste Plan. See Policies WP1, WP2, WP3, WP4 and WP5
Article 17: Control of hazardous waste	Environment Agency matter

Framework Articles	Corresponding South London Waste Plan policy
Article 18: Ban on the mixing of hazardous waste	Environment Agency matter
Article 19: Labelling of hazardous waste	Environment Agency matter
Article 20: Hazardous waste produced by households	Environment Agency matter
Article 21: Waste oils	Environment Agency matter
Article 22: Bio-waste	Municipal Waste Strategy matter
Article 23: Issue of permits	Environment Agency matter
Article 24: Exemptions from permit requirements	Environment Agency matter
Article 25: Conditions for exemptions	Environment Agency matter
Article 26: Registration	Environment Agency matter
Article 27: Minimum standards	Environment Agency matter
Article 28; Waste Management Plans	South London Waste Plan. See Key Issues 1, 2, 3, 4, 5 and 6. Policies WPI to WP9
Article 29: Waste prevention strategies	Municipal Waste Strategy matter
Article 30: Evaluation and review of plans and programmes	South London Waste Plan. See monitoring arrangements, framework and indicators
Article 31: Public participation	South London Waste Plan. See the Statements of Consultation related to the Examination-in-Public
Article 32: Co-operation	South London Waste Plan. See representations from the Mayor of London and Surrey County Council in the plan preparation phase
Article 33: Information to be submitted to the Commission	National Government matter
Article 34: Inspections	Environment Agency matter
Article 35: Record keeping	Environment Agency matter
Article 36: Enforcement and penalties	National Government matter
Article 37: Reporting and reviewing	National Government matter
Article 38: Interpretation and adaptation to technical progress	European Union matter
Article 39: Committee procedure	European Union matter
Article 40: Transposition	National Government matter
Article 41: Repeal and transitional provisions	Technical matter
Article 42: Entry into force	Technical matter

Part 2: How the South London Waste Plan is Compliant with the Clauses in Article 28 of the EU Waste Framework Directive

Clause	Requirement	South London Waste Plan
1	Establishment of a plan by a relevant authority	Yes
2	<p>The plan shall set out</p> <ul style="list-style-type: none"> ● An analysis of current waste management situation in geographical entity ● Measures to improve waste management ● Evaluation of how the plan will support the Directive 	<p>Yes</p> <p>Yes</p> <p>Yes, through this appendix</p>
3	The plan shall provide:	
3 (a)	Analysis of type, quantity and source of waste generated, cross-boundary movements and evaluation of waste streams in the future	Yes
3 (b)	Analysis of existing waste collection schemes, major disposal and recovery installations	Yes
3 (c)	Assessment of need for new collection schemes, closure of existing waste installations and additional waste infrastructure	Yes
3 (d)	Information on location criteria for site identification and the amount of new infrastructure needed	Yes
3 (e)	General waste policies, including on technologies and special waste streams	Yes
	The plan may contain	
4 (a)	Information on the organisation of waste management and on the relationship between the public and private sector	Yes
4 (b)	Evaluation of economic and other instruments in tackling various waste problems	No
4 (c)	Information on raising public awareness on waste issues	Yes (through consultation stages of the South London Waste Plan)
4 (d)	Information on contaminated waste disposal sites and their rehabilitation	Yes



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